



COLLEGE OF ACCOUNTANCY AND FINANCE

Limited Liability Company “Grāmatvedības un finanšu koledža” LLC, Registration No. 40003878227, Registration of the Register of Educational Institutions No. 3347801774, 4, Lomonosov Street, Riga, LV-1003, tel. +371 67338021, e-mail: gfk@koledza.lv, www.koledza.lv

APPROVED

*At the meeting of the Council of the College of Accountancy and Finance
on 27 September 2019, Minutes No.1-17/02*

PRIVACY POLICY

*Issued in accordance with the General Data Protection Regulations and
the Personal Data Processing Law*

I. GENERAL PROVISIONS

1. The Privacy Policy (hereinafter - the Policy) of the College of Accountancy and Finance (hereinafter - College) determines what personal data and for what purposes are processed by College, including the scope, protection, term of processing and other issues related to personal data protection.
2. Terms used in the Policy:
 - 2.1. Controller - College, registration number: 40003878227, legal address: 4 Lomonosov Street, Riga, LV - 1003;
 - 2.2. User – a natural person (data subject) who uses College services, inter alia visits and uses College premises, websites (websites of College and its structural units, registers, systems, etc.) and other IT resources managed by College;
 - 2.3. Service - a service provided to a user in accordance with the valid College bylaws, documents and laws and regulations in force in the Republic of Latvia, including College operation in relation to those information systems, data files and other information used for information processing, transmission, storage and other functions;
 - 2.4. User data - any information about the user that is known to College and that can directly or indirectly identify the user (for example, user name, surname, personal identification number, date of birth, IP address, etc.);
 - 2.5. User data processing - an activity or activities performed with user data (including collection, preservation, storage and modification of user data, granting of access, making requests, use, transfer, etc.) in any way and with any tools used for the said purpose;

- 2.6. Third party - any person who is not a user, College employee or authorised data processor.
3. By using the College Service, visiting the College premises, territory, website or otherwise providing College personal information, the user is deemed to have familiarised, read and understood this Policy.
4. All information provided by the user to College is provided on a voluntary basis. The user is personally responsible for the accuracy, adequacy and applicability of the data and information provided.
5. Questions related to the processing of personal data in College should be sent to the e-mail gfk@koledza.lv.
6. When communicating with the user, College is entitled to take additional measures to identify and document the fact of user identification, as well as to document the fact of information provided or other action taken.
7. College is entitled to refuse to ensure the fulfilment of the user's rights in the cases specified in the applicable laws and regulations, as well as in the event that the user unreasonably refuses to provide his/her identifying information.

II. PRIVACY POLICY SCOPE

8. This Policy applies to ensuring the protection of privacy and personal data in relation to:
 - 8.1. Natural persons - employees, students, other users, as well as third parties who, in connection with the provision of services to a natural person (student), receive or transfer any information to College (including contact persons, payers, etc.);
 - 8.2. College auditorium and other premises, including those for which video surveillance is performed;
 - 8.3. Visitors to websites maintained by College.
9. GFK takes care of users' privacy and protection of personal data, respects users' right to the lawfulness of personal data processing in accordance with applicable law – the Personal Data Processing Law, 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) and other applicable legislation in force in the field of privacy and data protection.
10. The Privacy Policy applies to the processing of data, regardless of the form and/or environment in which the user provides personal data (College premises, websites, College information systems, paper or telephone) and in which systems or paper form is processed.
11. With regard to specific types of data processing (e.g. cookie processing, photography, live or audio recording, etc.), environment, additional, specific rules may be laid down for purposes, of which the user is informed when he/she provides the relevant data to College.

III. LEGAL BASIS AND PURPOSES OF USER DATA PROCESSING

12. The legal basis for the processing of user data is one of the following:
 - 12.1. Conclusion and performance of the agreement, namely, to enter into an agreement with the user and ensure its performance;
 - 12.2. Compliance with laws and regulations in order to fulfil the obligations of College, specified in external laws and regulations;
 - 12.3. According to the user's consent;
 - 12.4. Lawful (legitimate) interests, namely, to realise the existing obligations between College and the user or the legitimate interests of College arising from the concluded agreement or law.
13. Purpose of user data processing:
 - 13.1. Provision of the service to the user;
 - 13.2. User identification;
 - 13.3. User identity verification;
 - 13.4. Implementation of other obligations and rights specified in the laws and regulations in force in the Republic of Latvia.
14. In order to provide the service, College processes the following user data:
 - 14.1. Name and surname;
 - 14.2. Personal identification code;
 - 14.3. Date of birth, if the user does not have a personal identification code, or any other personally identifiable information assigned to the user by the state;
 - 14.4. Contact information;
 - 14.5. Details of identity documents;
 - 14.6. Information on education;
 - 14.7. Photo;
 - 14.8. Information regarding studies, research and academic work, including data and information regarding the user's publications, patents and other information and documentation related to the user's professional, research and academic activities;
 - 14.9. Data on the activities performed during the use of the service, which are necessary for the provision of the service.
15. In order to ensure the achievement of the objectives referred to in paragraph 13 of this Policy, College maintains databases with user data.
16. User data is collected, stored and processed in accordance with the laws and regulations in force in the Republic of Latvia.
17. In providing the service, College acts in accordance with the laws and regulations in force in the Republic of Latvia, the standards arising therefrom or applicable in accordance with them, the bylaws of College and this Policy.

IV. USER DATA SECURITY AND TRANSFER TO THIRD PARTIES

18. User data are received from the user or his/her representative, as well as from third parties in accordance with the procedures specified in the laws and regulations in force.
19. College transfers user data to third parties in the following cases:
 - 19.1. The obligation to transfer user data arises from the laws and regulations in force in the Republic of Latvia;
 - 19.2. It is necessary to achieve the purpose of user data processing (provision of the service);
 - 19.3. With the expressed and unambiguous consent of the user.
20. College uses all reasonable means to ensure the security and privacy of user data. College regularly reviews the security measures taken and updates the technical means and organisational measures used.
21. College provides access to user data to those College employees who need it for the performance of their duties. These College employees have the right to process user data to the extent necessary for the performance of their duties.
22. Personal data may be transferred to other specified recipients for the performance of certain obligations specified in laws and regulations on the controller, for the implementation of legal interests, as well as for the performance of contractual obligations.
23. When using the services of a personal data processor, College takes the necessary measures to ensure that the processors of personal data process the personal data in accordance with the instructions of College and in accordance with the laws and regulations in force.
24. College's websites may contain links to third party websites that have their own terms of use and personal data protection for which College is not responsible.

V. CHANGES IN THE PROCESSING OF USER DATA AND TERMINATION OF PROCESSING

25. College stores and processes user personal data for as long as at least one of the following criteria exists:
 - 25.1. The agreement concluded with the user is valid;
 - 25.2. One of the parties has a legal obligation to store the data;
 - 25.3. The user's consent to the relevant processing of personal data is valid, unless there is another legal basis for the process.
26. The user is obliged to immediately inform College about any changes in the user data referred to in paragraph 14 of the Policy, as well as in cases where the said user data is incorrect or inaccurate, at the same time submitting the correct user data to College.
27. College has the right to request and the user is obliged to present College a document confirming the changes in the user data.

28. If necessary, the user has the right to amend, supplement or delete his/her data at any time, insofar as it does not contradict the applicable laws and regulations and insofar as it does not restrict the provision of the service, as well as other College functions, rights and obligations.

VI. RIGHTS OF THE DATA SUBJECT

29. The user is entitled to:

- 29.1. Receive information regarding his/her data and processing of this data by College in accordance with the laws and regulations in force;
- 29.2. Access the user data, request their correction or deletion, if permitted by the applicable laws and regulations;
- 29.3. Oppose the processing of user data;
- 29.4. User data portability;
- 29.5. Request the suspension or restriction of the processing of his/her data, if such right arises from the laws and regulations in force in the Republic of Latvia and it does not restrict the provision of the service, as well as other functions, rights and obligations of College;
- 29.6. Withdraw data processing if it based on the user's consent. In this case, the lawfulness of the processing carried out before the withdrawal of the user's consent is not affected;
- 29.7. In the event of a breach of his or her data processing rights, request that the person committing the breach terminate the breach of such data processing;
- 29.8. Turn to the Data State Inspectorate at any time to defend his/her violated rights.

VII. FINAL PROVISIONS

30. College reserves the right to unilaterally amend this Policy.

31. This Policy is available on the College website www.koledza.lv. It is the user's responsibility to ensure that he/she is familiar with the current version of the Policy, which is applied whenever he/she receives the service, visits the College websites or otherwise uses the College internet and other information resources.