

# LATVIJA UNIVERSITY OF LIFE SCIENCES AND TECHNOLOGIES

## PRIVACY POLICY

### I. General provisions

1. The aim of the privacy policy of Latvia University of Life Sciences and Technologies (hereinafter referred to as LBTU) is to provide a natural person (hereinafter referred to as a data subject) with the information on data processing performed by LBTU, including data processing purpose, legal basis, the data subject's rights, time period of the data processing etc.
2. The privacy policy is based on the requirements of the following regulatory enactments:
  - 2.1. 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 (hereinafter referred to as – Regulation);
  - 2.2. Law on Data Processing of Natural Persons and other regulatory enactments.
3. The Privacy Policy applies to ensuring the protection of privacy and personal data with respect to:
  - 3.1. LBTU students, trainees and lifelong education participants, including prospective and former;
  - 3.2. LBTU employees, including former and potential employees;
  - 3.3. cooperation partners and the third parties who receive or transfer any information to LBTU;
  - 3.4. visitors who are or have been present on the premises or buildings of LBTU which are equipped with video cameras;
  - 3.5. users of websites and information and communication technologies (ICT) systems managed by LBTU;
  - 3.6. visitors of events organized by LBTU;
  - 3.7. other persons whose personal data are processed by LBTU.
4. Information about the data controller:

Latvia University of Life Sciences and Technologies  
Legal address: Lielā street 2, Jelgava, LV-3001, Latvia  
Registration No: 90000041898  
Phone.: 630 22584  
E-mail: edokuments@lbtu.lv

### II. Terms

5. Terms used in privacy policy:
  - 5.1. **personal data** – any information relating to an identified or identifiable natural person;
  - 5.2. **data subject** – a natural person who can be directly or indirectly identified;
  - 5.3. **data processing** – any action or set of actions with personal data or sets of personal data, whether or not by automated means, such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, viewing, using, disclosing, transmitting data, distributing or otherwise making them available, as well as reconciliation or combining, limiting, deleting or destroying data;
  - 5.4. **data controller** – natural or legal person, public authority, agency or other body, which determines the purposes and means of processing personal data, as well as is responsible for the processing of personal data in accordance with the requirements of regulatory enactments

- 5.5. **data processor** – a natural or legal person, public institution, agency or other body which processes personal data on behalf of the controller;
- 5.6. **the third party** – a natural or legal person, public institution, agency or body other than a data subject, a controller, a processor or a person who is authorized to process personal data under the guidance of the controller or processor;
- 5.7. **the consent of data subject** – any freely given, specified, deliberate and unambiguous statement of a data subject’s wishes in the form of a statement or explicit consent by which he or she consents to the processing of his or her personal data.

### **III. Purpose and basis of personal data processing**

- 6. Data processing has one of the following purposes:
  - 6.1. attraction and selection of prospective applicants
  - 6.2. provision and administration of the study process;
  - 6.3. provision, administration and promotion of research activities (including technology and knowledge transfer);
  - 6.4. lifelong education implementation and its administration;
  - 6.5. establishment and maintenance of contractual obligations;
  - 6.6. services of student hotel and rent administration;
  - 6.7. implementation of management functions;
  - 6.8. payment administration and inventory registration;
  - 6.9. debt recovery and collection;
  - 6.10. providing services for fees and their administration by LBTU;
  - 6.11. giving recognition and showing honor;
  - 6.12. personal identification and communication;
  - 6.13. dealing with submissions, statements and complaints;
  - 6.14. promotion of LBTU publicity and information of society;
  - 6.15. providing ICT functionality and security;
  - 6.16. prevention or detection of criminal offences relating to the protection of property and the protection of interests of individuals
  - 6.17. provision of information to public administration and law enforcement institutions in the cases and to extent specified in regulatory enactments;
  - 6.18. execution of required regulatory enactments;
  - 6.19. for other specified purposes on which a data subject is informed before data processing.
- 7. The processing of personal data at LBTU is based on one of the following conditions according to the law:
  - 7.1. consent of a data subject is required;
  - 7.2. signing and implementation of the agreement – in order to sign the agreement based on the data subject’s application and implement the agreement;
  - 7.3. to fulfil obligations according to regulatory enactments – to fulfil obligations specified in the binding regulatory enactments of LBTU;
  - 7.4. to protect the vital interests of the data subject or of another natural person;
  - 7.5. for the benefit of society – to perform tasks required for the benefit of society;
  - 7.6. implemented in the legitimate interests of LBTU. LBTU implements the processing of personal data in the following legitimate interests
    - 7.6.1. provide good quality services;
    - 7.6.2. ensure access of a person belonging to LBTU when entering LBTU facilities;
    - 7.6.3. improve the study process;

- 7.6.4. to promote LBTU recognition among prospective students and the society on the whole;
- 7.6.5. to promote the recognition of academic staff members among students;
- 7.6.6. to inform persons about failed obligations, planned events or other information related to data subjects;
- 7.6.7. to ensure correct operation of ICT and to timely detect and eliminate potential technical problems, as well as illegal activities;
- 7.6.8. to prevent criminal offences;
- 7.6.9. enhance LBTU managed website attendance and provide user interaction experience with it;
- 7.6.10. to apply to law enforcement authorities to protect legal rights;
- 7.6.11. other legitimate necessities of which data subjects are informed prior to the provision of the data.

#### **IV. Collection and storage of personal data**

- 8. Personal data shall be obtained for data subjects:
  - 8.1. according to the terms of agreement after its conclusion;
  - 8.2. data subjects submit personal data themselves by, for example, by filling in the registration form for participation in the seminar;
  - 8.3. data subjects perform activities requiring submission of personal data, for example, by successfully connecting to the information system managed by LBTU
  - 8.4. from other institutions with which LBTU has concluded a contractual relationship in order to perform a function delegated by law, for example, obtaining data of applicants from the joint online application system
  - 8.5. data subjects are present at an event organized by LBTU or LBTU premises, for example, data subjects are in the LBTU building with installed video cameras.
- 9. Personal data are processed in case of at least one of the following criteria:
  - 9.1. while personal data are necessary to fulfil the data processing purpose;
  - 9.2. contractual obligations are in force with data subjects;
  - 9.3. it is necessary to implement LBTU legal rights;
  - 9.4. personal data are stored for the time period determined in the regulatory enactments;
  - 9.5. while data subjects have not withdrawn their prior consent unless there is another legal reason for data processing;
  - 9.6. to ensure evidence while someone may bring legal claims and/or initiate legal proceedings against LBTU.
- 10. If the storage of personal data does not correspond to any of the criteria for the processing of personal data anymore, the personal data shall be deleted or anonymized.
- 11. Data from backup copies of information systems managed by LBTU are deleted as soon as the backup copy expires.

#### **V. Categories of recipients of personal data**

- 12. LBTU does not disclose to the third parties the personal data of the data subject and information obtained during the contractual obligations, except for:
  - 12.1. if the data must be transferred to the respective third party according to the concluded agreement in order to perform a function necessary for providing a service or required by the law;
  - 12.2. in accordance with the clear and unambiguous consent of data subjects, which does not contradict the requirements of regulatory enactments;

- 12.3. in the cases specified in regulatory enactments, which require provision of information to a certain extent to third parties, public administration and law enforcement institutions.

## **VI. Transfer of personal data to a third country or international organization and automated decision making**

13. If it is necessary to transfer personal data outside the European Union or European Economic Zone, LBTU implements the specified procedures for ensuring the level of personal data processing and protection in accordance with regulatory enactments.
14. In some cases, when grading LBTU students' learning outcomes in a study course of online E-studies information system, semi-automated decision-making can be used based on the assessment results.
15. The algorithm for determining the assessments depends on the requirements of the study course, which students are introduced to when starting the specific study course.
16. Regarding the promotion of scientific activity of LBTU academic staff and motivation of academic staff, LBTU applies profiling (automated or semi-automated data processing, which manifests itself as the use of personal data to evaluate specific personal aspects related to a person) in accordance with LBTU procedures. A data subject has the opportunity to object to this processing by contacting the respective department that is an organizer of the process.

## **VII. Data subjects' rights and obligations**

17. Data subjects have the following rights regarding their personal data:
  - 17.1. request access to your personal data, including request a copy of the data, as well as ask to add additional data, correct or delete them;
  - 17.2. to receive the information stated in the regulatory enactments regarding the personal data processing;
  - 17.3. to object to processing of the personal data or restrict it;
  - 17.4. to request the transfer of your personal data to another controller;
  - 17.5. to withdraw the consent to process the personal data, if the legal basis for data processing is the consent of data subjects.
18. LBTU implements the rights of data subjects, if their implementation does not conflict with other regulatory enactments.
19. LBTU students and employees have the right to get access to their personal data in LBTU Information System.
20. The obligation of data subjects is to provide LBTU with correct personal data, as well as, if necessary, to report and request correction or deletion of their data, if they have changed.
21. If data subjects have any objections, claims or complaints in connection with the processing of personal data by LBTU, they must contact a staff member in charge of data processing or an IT system security manager. If it is not possible to resolve the issue within LBTU, a data subject has the right to submit a complaint to the Data State Inspectorate or law enforcement bodies.

## **VIII. LBTU obligations in personal data processing**

22. LBTU shall, within the framework of the processing of personal data, ensure:
  - 22.1. provision of appropriate information to the data subjects regarding the processing of his personal data;
  - 22.2. the possibility for the data subject to realize his rights regarding the protection of his personal data;
  - 22.3. performing technical and organizational measures to protect personal data against accidental, unauthorized or unlawful access, disclosure, correction or loss, taking into account the organizational, financial and technical resources available at LBTU;
  - 22.4. to report to a data subject personal data breaches without undue delay in order to prevent damage to the rights and freedom of individuals;
  - 22.5. processing of personal data shall be performed only by those persons subordinate to the controller who are entitled to perform it in accordance with the duties of the work.

## **IX. Procedure for implementing data subjects' rights**

23. In order to exercise the rights specified in the Regulation, a data subject must submit a completed request form (available on the LBTU website or given in person) or a written application.
24. In order to implement rights included in Paragraph 17.1., data subjects have to apply to:
  - 24.1. Personnel Department (if a person is an employee of LBTU);
  - 24.2. The dean's office of a faculty (if a person is a student of LBTU);
  - 24.3. Document Management Department (if a person is neither an employee nor a student of LBTU).
25. In order to implement rights included in Paragraphs 17.2. – 17.5, data subjects have to apply to Document Management Department.
26. Upon receipt of the request, the specific data subject is identified: an identified person is considered to be the data subject if he/she has applied in one of the following ways:
  - 26.1. arrived in person to a relevant LBTU department and produced personal ID document;
  - 26.2. sent a request to LBTU e-mail [edokuments@lbtu.lv](mailto:edokuments@lbtu.lv) by signing this document with a secure electronic signature;
  - 26.3. sent a request using an e-address service.
27. If the request for the rights of a data subject is made by its legal representative, it shall be made only in person, producing the original document on the representation of the rights of the data subject.
28. In certain cases, data subjects may exercise their rights in other ways, such as by objecting orally during an event or by sending an e-mail stating that they do not wish to receive commercial messages, provided that the objection is received from the same e-mail address to which the commercial message was sent.
29. In cases when the data subject repeatedly (more than once every six months) requests LBTU to issue copies of personal data, LBTU is entitled to request payment in accordance with the Rector's order on paid services for providing information

## **X. Processing cookies**

30. Cookies are used to provide effective functionality of LBTU websites; data subjects are informed about them when visiting the website for the first time.

31. Data subjects have the right to change the settings of the web browser so that cookies are not used. In this case, the functionality of the particular website may be affected.
32. Information on types of cookies used by LBTU and their processing is available on the website: <https://www.lbtu.lv/sikdatnu-lietosana>.

## **XI. Taking photos and filming during LBTU public events**

33. In order to inform the society about LBTU activities, promote the publicity of LBTU and record the fact of a significant event, photography, filming or live video streaming can be performed at events organized by LBTU.
34. LBTU informs about the photography and filming performed at the events by placing a warning sign at the entrance to the event or by including a relevant notice in invitations, posters and other informative materials about the event.
35. The photos and videos from events can be posted on LBTU websites, social media, as well as in informative materials.
36. In cases when a data subject does not want to be photographed or filmed at LBTU event, it is necessary to contact the organizer of the event with a request.
37. Data subjects have the right to apply to the Latvia University of Life Sciences and Technologies with a request to delete the photograph or video taken, in which the specific data subjects are depicted.
38. LBTU is not responsible for photographs or videos taken and published by the third parties.

## **XII. Other provisions**

39. Privacy Policy is approved by the LBTU Council and its current version is posted in the LBTU website: <https://www.lbtu.lv/>.
40. A separate privacy policy has been developed with regard to the maintenance and storage of the library's unified national electronic joint catalogue and unified reader database, in which LBTU share responsibilities of a joint controller with other ALEPH libraries, which is posted in the website of the LBTU Fundamental Library: <https://lbtufb.lbtu.lv/>.
41. Additional information on data subjects' rights at LBTU or other information related to personal data protection can be obtained by contacting the LBTU IT system security manager by sending a message to e-mail: [itdrosiba@lbtu.lv](mailto:itdrosiba@lbtu.lv).