

Privacy

Terms of privacy protection

Dear members of the academic community and students, in these privacy conditions we want to provide you with information about the processing of your personal data in the conditions of our university in accordance with Regulation of the European Parliament and the EU Council 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data (hereinafter "GDPR"). These privacy protection conditions are intended for all affected persons about whom we process personal data, including students, employees, suppliers, contractual partners and persons located on our premises.

Who is the operator and where can you contact us?

The operator that processes your personal data is the University of Security Management in Košice MM n.p.o Košice, with its registered office at Košťova 1, 04001 Košice, Slovak Republic, IČO: 52540448 (hereinafter referred to as "VŠBM"), which is considered the operator even in cases , when your personal data is processed by other independently managed parts of VŠBM (e.g. library, special facilities, etc.). The operator has the status of a private university in accordance with Act no. 131/2002 Coll. on universities and on the amendment of certain laws (hereinafter referred to as the "Law on Universities").

In order to strengthen the guarantees and legal guarantees of the rights and freedoms of the persons concerned in the processing of your personal data, we have appointed a responsible person who oversees the legality and security of the processing of personal data. The responsible person is also your point of contact for any questions or requests regarding the protection of personal data.

Contact details of our responsible person VŠBM:

Ing. Peter Havaj, PhD.

Tel. : 055 / 720 56 17

e-mail: responsible.person@vsbm.sk

correspondence address: person responsible for personal data protection, University of Security Management in Košice, Košťova 1, 040 01 Košice, Slovak Republic.

Why do we process personal data?

We must process personal data in order to be able to fulfill the obligations and tasks that arise from us as a university:

- from generally binding legal regulations;
- from legitimate or public interests that we pursue;
- from contractual relations.

For what purposes do we process your personal data?

We process your personal data for the following purposes:

| | The purpose of personal data processing | Primary legal basis |
|-----|--|---|
| 1. | Personnel and payroll purposes | Fulfillment of legal obligations (Article 6(1)(c) GDPR) |
| 2. | Control mechanisms of the employer | Legitimate interest (Article 6(1)(f) GDPR): control of compliance with work discipline |
| 3. | Accounting and tax purposes | Fulfillment of legal obligations (Article 6(1)(c) GDPR) |
| 4. | Academic self-government | Fulfillment of legal obligations (Article 6(1)(c) GDPR) and tasks in the public interest (Article 6(1)(e) GDPR) |
| 5. | Fulfilling the duties and tasks of the university in the public interest | Fulfillment of legal obligations (Article 6(1)(c) GDPR) and tasks in the public interest (Article 6(1)(e) GDPR) |
| 6. | Securing and providing studies (study purposes) | Fulfillment of legal obligations (Article 6(1)(c) GDPR) and tasks in the public interest (Article 6(1)(e) GDPR) |
| 7. | Issuance of study cards | Fulfillment of legal obligations (Article 6(1)(c) GDPR) and tasks in the public interest (Article 6(1)(e) GDPR) |
| 8. | Fulfillment of legal obligations | Fulfillment of legal obligations (Article 6(1)(c) GDPR) |
| 9. | Voluntary disclosure of personal data | Consent of the person concerned (Article 6(1)(a) GDPR) |
| 10. | Protection of property, order and security | Legitimate interest (Article 6 paragraph 1 letter f) GDPR): protection of property, order and security |
| 11. | Proving, exercising and defending legal claims (legal agenda) | Legitimate interest (Article 6(1)(f) GDPR): proving, exercising and defending legal claims |
| 12. | Ensuring IT security | Fulfillment of legal obligations (Article 6(1)(c) GDPR) |
| 13. | Library and information purposes (academic library) | Fulfillment of legal obligations (Article 6(1)(c) GDPR) and tasks in the public interest (Article 6(1)(e) GDPR) |
| 14. | Scientific research | Art. 89 GDPR |
| 15. | Academic, artistic and literary purpose | § 78 par. 1 of the Personal Data Protection Act |
| 16. | Journalistic purposes | § 78 par. 2 of the Personal Data Protection Act |
| 17. | Raising awareness of the college (marketing purposes) | Legitimate interest (Article 6(1)(f) GDPR): raising awareness of the university |
| 18. | Sending marketing communications (newsletter) | Consent (Article 6(1)(a) GDPR) |
| 19. | Conclusion and fulfillment of contracts with natural persons | Fulfillment of the contract, including pre-contractual relations (Article 6, paragraph 1, letter b) GDPR) |
| 20. | Handling complaints | Fulfillment of legal obligations (§ 13 paragraph 1 letter c) of the Personal Data Protection Act) |
| 21. | Statistical purposes | Article 89 GDPR |
| 22. | Archival purposes | Article 89 GDPR in connection with the Act on Archives and Registries |

To whom do we provide your personal data?

Recipients of the personal data of the persons concerned are also various groups of entities to whom we provide your personal data most often as part of the fulfillment of our legal obligations and/or it is our own employees with whom you come into contact as the persons concerned. Detailed information of recipients to whom we can provide your personal data can be found in this table of recipients (pdf format).

Is there a cross-border transfer of your personal data?

By default, we limit any cross-border transfers of personal data to third countries outside the European Economic Area (i.e. outside the EU member states, Iceland, Norway and Liechtenstein) if it is not necessary. The reason is that these third countries do not have to ensure an adequate level of personal data protection according to the decisions of the EU Commission. However, in some cases such transfers do occur. Your personal data may be transferred to a third country, especially in cases where you apply to VŠBM for cross-border mobility within the framework of available student or employee mobility programs that enable study and/or work stays at foreign universities and/or when you request from VŠBM in relation to a foreign sending the employer or institution a confirmation of proper completion of the study program at VŠBM. Personal data can be transferred without restrictions within the European Economic Area and the following countries that currently provide an adequate level of personal data protection according to the decisions of the EU Commission: Principality of Andorra, Argentina, Faroe Islands, Guernsey , Israel, Jersey, New Zealand, Canada (commercial organizations), Isle of Man, Switzerland, Eastern Republic of Uruguay, United States of America (Privacy certified companies Shield).

A transfer to any other third countries (or companies that do not meet specific sector requirements in the case of Canada and the United States of America) constitutes a cross-border transfer of personal data to a third country that does not guarantee an adequate level of protection. If such a transfer is necessary, we try to achieve adequate guarantees according to Art. 46 of the GDPR, thanks to which the recipient of personal data in a third country is bound by an equivalent personal data protection regime as in force in the EU. Most often, it concerns the closing of the so-called standard contractual clauses approved by the EU Commission, if it is objectively possible. If this is not possible, we must proceed according to the exceptions for special situations according to Art. 49 GDPR. Most often, it is your consent to the transfer or the fulfillment of the contractual relationship.

VŠBM also uses secure cloud services of a verified provider with servers located in the jurisdiction of the EU, while cross-border data transfer to the USA may also occur on the part of the cloud service provider, which is our intermediary. This intermediary is Microsoft Inc. , which is certified by a system of legal guarantees known as Privacy Shield . You can find out more information about the special legal guarantees for these cross-border transfers of data including your personal data in Microsoft's statement on the protection of personal data and also in the answers to the special legal guarantees used for cross-border transfers.

Is there automated processing of personal data with legal effect and/or other significant impact on you?

To automated individual decision-making in the sense of Art. 22 GDPR may occur in the following cases:

1. Checking the originality of the final thesis

Used procedure : Anti -plagiarism software that scans publicly available sources and thus obtains a huge amount of data from other works and professional publications from abroad into the register, while this software evaluates the degree of agreement of the final work with other works in the register.

Meaning : The correct determination of the percentage of conformity of the assessed final thesis with other final and academic theses within the framework of the fulfillment of the legal obligations of the public higher education institution.

Expected consequences : Percentage decision on compliance (positive / negative). Negative: not admitting works showing signs of plagiarism for defense.

Pursuant to § 63 par. 7 of the Act on Universities, we are obliged to verify the degree of originality of theses. In this case, we rely on the legal basis that is permitted by law. We therefore proceed in accordance with Art. 22 par. 2 letters b) GDPR as per art. 22 par. 3 GDPR means that you do not have the right to: human intervention by the operator; express your opinion or; challenge the decision. Nevertheless, if we receive relevant requests from data subjects who have legitimate doubts about the correctness of the processing of their personal data when performing automated individual decision-making, we will check these requests.

How long do we keep your personal data?

We keep personal data for as long as it is necessary for the purposes for which the personal data is processed. In general, the retention period results from legal regulations. If it does not follow from the legal regulations, we always determine the storage period of your personal data in relation to specific purposes through our internal policies and/or our registry plan. If we process your personal data on the basis of consent, after its withdrawal we are obliged not to process the personal data further for the given purpose. However, this does not rule out that we may continue to process your personal data on another legal basis, especially if it concerns the fulfillment of legal obligations.

The general retention periods of personal data for the purposes defined by us for the processing of personal data are as follows:

| The purpose of personal data processing | Retention period or criteria for its determination |
|--|--|
| Personnel and payroll purposes | During the duration of the employment relationship and the expiration of the statutory periods for the storage of certain types of documents (usually 5 to 10 years, in some cases up to 70 years from the birth of the employee). |
| Control mechanisms of the employer | 4 years |
| Accounting and tax purposes | 10 years |
| Academic self-government | 5 to 10 years, see registration plan. |
| Fulfilling the duties and tasks of a public university | 5 to 10 years, see registration plan. |
| Securing and providing studies (study purposes) | 50 years from the end of the studies of the person concerned in the register of students (Section 73(8) of the Act on Universities) |
| Issuance of study cards | 5 to 10 years, see registration plan. |
| Fulfillment of legal obligations | During the duration of the legal obligation, see the registration plan. As a rule, from 5 to 10 years. |
| Voluntary disclosure of personal data | Until withdrawal of consent. |
| Protection of property, order and security | 5 years |

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| Proving, exercising and defending legal claims (legal agenda) | As a rule, 4 to 10 years, see the registration plan. |
| Ensuring IT security | During the duration of other processing purposes for which personal data are processed in IT systems. |
| Provision of food and accommodation | During the duration of the relationship with the person concerned regarding accommodation or meals. |
| Library and information purposes (academic library) | 5 to 10 years, see registration plan. |
| Scientific research | 5 to 10 years, see registration plan. |
| Academic, artistic and literary purpose | 5 to 10 years, see registration plan. |
| Journalistic purposes | See registration plan. |
| Raising awareness of the college (marketing purposes) | Until objection, usually 5 years. |
| Sending marketing communications (newsletter) | Until withdrawal of consent. |
| Conclusion and fulfillment of contracts with natural persons | As a rule, 5 to 10 years, see the registration plan. |
| Handling complaints | 10 years from the disposal of the complaint. |
| Statistical purposes | During the duration of other processing purposes. |
| Archival purposes | During storage or archiving periods. |

Further information about the periods during which we store personal data will be provided by our responsible person at the above contact details.

How do we obtain your personal data?

In the event that the legal basis for the processing of your personal data is the consent to the processing of personal data according to Article 6 par. 1 letter a) GDPR you are never obliged to provide your personal data. The provision of your personal data is based on your free consideration and voluntary action. You have the right to withdraw the given consent at any time. Failure to provide personal data should not have any negative and significant consequences for you, but it may reduce the comfort of using some services and your information about news.

In the event that the legal basis for the processing of your personal data is the conclusion or performance of a contractual relationship pursuant to Article 6, paragraph 1 letter b) GDPR provision of personal data is a requirement that is necessary to conclude a contract. Failure to provide personal data may result in failure to close the contractual relationship.

In the event that the legal basis for the processing of your personal data is the fulfillment of our legal obligation pursuant to Article 6 par. 1 letter c) GDPR or the fulfillment of a task in the public interest according to Article 6 par. 1 letter e) GDPR provision of your personal data is a legal requirement. Failure to provide personal data may result in the inability to fulfill the task ensured within the scope of the academic self-government bodies, or the decision that you request from us cannot be issued, or otherwise, the fulfillment of an important task that VŠBM, as a university, performs in the public interest or is supposed to fulfill within the framework of its legal obligations may be thwarted.

In the event that personal data is processed for the purpose of fulfilling obligations under Act No. 307/2014 Coll. on some measures related to the reporting of anti-social activity and on the amendment of some laws, the failure to provide personal data of the informant does not result in the non-investigation of an anonymous complaint. The consequence of submitting an anonymous complaint is that we will not inform you about the result of its investigation.

In the event that the legal basis for processing your personal data is a legitimate interest and we use the legal basis for processing your personal data according to Article 6 para. 1 letter f) GDPR, you are obliged to tolerate this processing, but you have the right to object to it. Learn more about this right in the highlighted section below. We can also obtain personal data from other public authorities or from publicly available registers.

What are your rights when processing personal data?

"If we process personal data about you based on your consent to the processing of personal data, you have the right to withdraw your consent at any time. You have the right to object effectively at any time to the processing of personal data for the purposes of direct marketing, including profiling."

"You also have the right to object to the processing of your personal data on the basis of legitimate or public interests according to Art. 6 par. 1 letter e) and f) GDPR as explained above."

We care about the protection of your personal data, which is why we strive to secure it through individual, modern technical and organizational measures, as well as through the possibility to exercise your data subject rights according to the GDPR at any time by means of a request.

Requests for the exercise of the rights of the affected person can be sent to us electronically or in writing to the aforementioned contact details of the responsible person. This procedure does not affect your right to revoke your consent to the processing of personal data, which you can always revoke as easily as you gave it to us (e.g. if you gave your consent electronically, you can always revoke it by email without the need to send a written request to the address of the VŠBM headquarters) or Your right to object by automated means using technical specifications, if available. For each request, we recommend that you explain in as much detail as possible what right you are exercising in terms of the GDPR, what your identification data is (for identity verification) or what purposes and data the request relates to. In the case of overly general requests, we must ask for clarification.

The GDPR establishes the general conditions for the exercise of your individual rights. However, their existence does not automatically mean that we will comply with them when exercising individual rights, as exceptions or some rights are linked to specific conditions that may not be met in every case. We will always deal with and examine your request regarding a specific right in terms of legislation and our internal policy for handling data subject complaints. As a data subject, you have in particular:

- The right to request access to personal data according to Article 15 GDPR that we process about you. This right includes the right to confirmation as to whether we are processing personal data about you, the right to access that data and the right to obtain a copy of the personal data we are processing about you, if technically feasible;
- The right to correct and supplement personal data according to Article 16 GDPR, if we process incorrect or incomplete personal data about you;
- The right to delete your personal data according to Article 17 GDPR;
- The right to restrict the processing of personal data according to Article 18 GDPR;
- The right to data portability pursuant to Article 20;
- The right to object to legitimate or public interests that we pursue according to Art. 21 GDPR.

As a data subject, you also have the right to file a complaint at any time with the supervisory authority, which is the Personal Data Protection Office of the Slovak Republic pursuant to Section 100 of the Personal Data Protection Act. More information can be found on the website www.dataprotection.gov.sk

We would like to inform you that when processing your request for the exercise of the right of the data subject under the GDPR, we may ask you for reliable verification of your identity, especially in cases where there are doubts about your identity. It is our duty to prevent the provision of personal data about you to an unauthorized person. The processing of your request associated with the exercise of your

data subject rights under the GDPR is free of charge. If your request is manifestly unfounded or unreasonable, in particular because it is repeated, we are entitled to charge a reasonable fee that takes into account administrative costs.

How do we protect your personal data?

It is our duty to protect your personal data in an appropriate manner and for this reason we pay due attention to their protection. We have implemented generally accepted technical and organizational standards for the purpose of maintaining the security of processed personal data, especially against their loss, misuse, unauthorized modification, destruction or other impact on the rights and freedoms of the persons concerned. In situations where sensitive data is transmitted, we use encryption technologies.

Cookies

Cookies are small text files that improve the use of the website, e.g. by making it possible to recognize previous visitors when logging into the user environment, by remembering the visitor's choice when opening a new window, measuring website traffic or the way it is used for its user improvement. Our website uses cookies mainly for the purpose of ensuring the functioning of the website and basic measurement of its traffic. You can prevent these files from being stored on your device at any time by setting your web browser. Your browser settings are in accordance with § 55 par. 5 of the Electronic Communications Act, considered as your consent to the use of cookies on our site. However, by blocking cookies, you can limit the functionality of some websites (especially if login is required).

Social networks

We recommend that you familiarize yourself with the privacy protection conditions of the providers of the social media platforms through which we communicate. Our privacy policy only explains basic issues regarding the management of our profiles. We only have typical administrator rights when processing your personal data through our profiles. We assume that by using social networks, you understand that your personal data is primarily processed by social network platform providers and that we have no control over this processing, further provision of your personal data to third parties and cross-border transfer to third countries carried out by these social network platform providers and we are not responsible for it.

Change of privacy protection conditions

Personal data protection is not a one-time issue for us. The information that we are obliged to provide you with regard to our processing of personal data may change or cease to be up-to-date. For this reason, we reserve the right to modify and change these conditions to any extent at any time. In the event that we change these conditions in a significant way, we will bring this change to your attention, e.g. by a general announcement on this website or a special announcement via email.