



MANAGEMENT COLLEGE

"Management College" Ltd., Reg.Nr. 50203022521, educational institution registration Nr. 3347802535, Lomonosova street 1, bldg.4, Riga, LV-1019, phone 28007735, e-mail: info@mcollege.eu, www.mcollege.eu

APPROVED

30.10.2018.

At the Council meeting,

Protocol No.5

Privacy policy

1. SCOPE OF PRIVACY POLICY

1.1. Limited liability company "Management College" (*hereinafter referred to as "the College"*), registration No 50203022521, privacy policy lays down the procedures by which the College processes personal data in order to ensure the interests and freedoms of the data subject, the fair and lawful processing of personal data.

1.2. This Policy shall apply if a physically identifiable person (*hereinafter referred to as "Data subject"*) has used, uses, or has desire to use the services provided by the College, or otherwise affiliated with the College, including with respect to the Data Subject established prior to the entry into force of this policy.

2. CONTROLLER FOR PROCESSING PERSONAL DATA

2.1. Personal Data Processing Manager is the College, Registration No 50203022521, registered office: Lomonosova Street 1 bldg.4, Riga, LV-1019; place of implementation of study programs - Lomonosova Street 4, Riga, LV-1003, phone - +371 28007735.

2.2. A request for the exercise of their rights may be made in accordance with the Section 11 of the Privacy Policy.

3. GENERAL REGULATIONS

3.1. The purpose of the privacy policy is to provide information to the data subject on the purpose of processing personal data, the legal basis, the extent, protection and other activities with data carried out during the processing of personal data. Detailed information on the processing of personal data may be specified in contracts and in the internal regulatory enactments of the College.

3.2. When College processing data subjects' personal data, the College shall fully comply with the applicable laws and regulations:

- Regulation of 27.04.2016 of the European Parliament and of the Council Regulation (EU) 2016/679 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 - Regulation*), and

- the "Law on the Processing the Data of Natural Persons" and other regulatory enactments regulating data protection, accepted by the Saeima of the Republic of Latvia and announced by the President of Latvia.

3.3. The College shall ensure the confidentiality of personal data and shall implement appropriate technical and organizational measures to protect personal data from unauthorized access, illegal processing or disclosure, accidental loss, alteration or destruction.

4. SCOPE OF APPLICATION OF PRIVACY POLICY

4.1. Personal data shall mean any information relating to an identified or identifiable natural person, as well as data using which it is possible to identify a particular person. The categories of personal data are listed in this section.

4.2. The College shall apply the Privacy Policy to the protection of privacy and personal data in relation to:

- **Natural persons:** academic staff, guest lecturers, general staff, students, graduates, home page visitors, users of any College services (*including potential, former and existing*), as well as third parties who, in the context of the provision of services to a natural person, receive or transfer to a College any information that can be linked and defined as the subject's personal data (contacts, paying agents, etc).
- **Users of websites** maintained by a College (*hereinafter referred to as "Data subject"*).

4.3. The College shall take care of the privacy of the data subject and the protection of personal data, respect the Data Subject's right to the legality of the processing of personal data in accordance with the applicable law, the Law on the Processing of Natural Persons Data, the EU Regulation and other applicable law in the field of privacy and data processing.

4.4. The privacy policy applies to data processing, regardless of which form and environment the data subject provide personal data (*on a College website, mobile apps, paper, telephone or electronic transmission*) and in which systems they are processed.

4.5. In the case of specific types of data processing (*e.g. processing of cookies, etc.*), additional, specific provisions may be laid down for the environment or purposes for which the data subject is informed at the time when he provides the relevant data to the College.

5. PURPOSE OF THE PROCESSING OF PERSONAL DATA AND LEGAL BASIS

5.1. The College processes the Data subject's personal data on the following legal bases:

- for the conclusion and performance of a contract - to enter into a contract at the request of the Data Subject and to enforce it;
- regulatory compliance - to meet the College's external regulatory obligations;
- According to the wishes and actions of the Data Subject, such as filling out application forms for specific purposes (*the free study of study materials*);
- subject to the consent of the Data Subject;
- legitimate interests - to fulfill the legitimate interests of the College arising out of the obligations between the College and the Data Subject, or arising from the contract or law.

5.2. College's legitimate interests:

- to provide an opportunity to obtain a level 1 vocational higher education for all stakeholders through the electronic environment and on-site;
- conduct business in the field of education;
- verify the identity of the Data Subject prior to entering into the contract;

- ensure fulfillment of contractual obligations;
- to retain the Data Subject's applications and applications for the provision of services, other applications, and admissions, and notes thereon, including those made verbally by calling the College, providing written information in electronic or paper form, and on websites;
- Analyze, develop and implement improvements to the College's website and mobile applications;
- take action to retain the Data Subject;
- promote the College's services by sending commercial communications;
- send other reports on the progress of the contract and any events relevant to the performance of the contract, as well as conducting surveys of the Data Subject on the quality of the services provided to facilitate the introduction of new and promising innovations;
- provide financial and business accounting and analysis;
- ensuring and improving the quality of service;
- administer payments;
- administer outstanding payments;
- apply to public administration, investigatory authorities and the courts to protect their legal interests;
- to inform the public about its activities.

5.3. For the provision of information to public administrations and investigative entities in accordance with the laws and regulations of the Republic of Latvia and for other specific purposes for which the Data Subject is notified at the time of submitting certain data to the College.

6. PROCESSING PERSONAL DATA

6.1. The College shall process data subject data taking into account existing privacy risks and the organizational, financial and technical resources available to the College.

6.2. In order to ensure the quality and operational performance of the contractual obligations entered into with the Data subjects, the College may authorize its business partners operating on the basis of a cooperation agreement to carry out separate service activities. If in performing these tasks, College partners process the data subject's personal data held by the College, the College partners concerned shall be regarded as College data processing operators (processors) and the College shall have the right to transfer the data subject personal data needed to their partners to the extent necessary for the performance of these activities.

6.5 College partners (as controller) will ensure that the requirements for the processing and protection of personal data are fulfilled in accordance with the requirements and legislation

established by the College and will not use personal data for other purposes than the performance of a contract concluded with the Data Subject or a sent request (in paper form, telephone or electronic) on behalf of the College.

7. PROTECTION OF PERSONAL DATA

The College shall protect data subject data, taking into account existing privacy risks and the organizational, financial and technical resources available to the College, including through the following security:

- Encrypting data by transmitting data (*SSL encryption*);
- intrusion protection and detection programs;
- Other protective measures in line with current technical development capabilities.

8. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The College shall not disclose to third parties the personal data of the data subject or any information obtained during the provision of services and the operation of the contract, including information regarding received electronic communications, content or other services, except for:

where the third party concerned has to transfer the data within the framework of a contract in order to carry out a function required for the performance of the contract or delegated by law (*for example, a bank within the framework of a settlement or to provide another service for which the data subject is informed in the relevant contract*);

in accordance with the consent of the data subject;

persons provided for in external regulatory enactments, upon a reasoned request thereof, in accordance with the procedures specified in internal and external regulatory enactments;

in cases specified in external regulatory enactments for the protection of the legitimate interests of the College, for example by appealing to a court or other State institutions against a person who has infringed the legitimate interests of the College.

9. DURATION OF STORAGE OF PERSONAL DATA

9.1. The College shall keep and process the personal data of the Data Subject until at least one of the following criteria exists:

- within the duration of the contract concluded by the College and the Data Subject;
- pending the provision of a service provided by the Data Subject to the College by means of Internet site tools, telephone, e-mail or paper application;

- as long as, in accordance with the procedures specified in internal and external regulatory enactments, the College or the Data Subject can exercise its legitimate interests (*for example, to object or bring an action before a court*);
- as long as either party has a legal obligation to keep the data;
- as long as the data subject's consent for the relevant processing of personal data is valid unless there is another legitimate basis for the processing of the data.

After the conditions referred to in paragraph 9.1 of this Section cease, the personal data of the data subject shall be deleted.

10. ACCESS TO PERSONAL DATA AND OTHER DATA SUBJECT RIGHTS

10.1. The data subject has the right to receive the information prescribed by law in relation to the processing of his or her data.

10.2. The Data Subject also has the right, in accordance with law, to request the College to have access to its personal data and to request the College to add, correct, or delete it, or to restrict the processing of the data subject, based on the College's legitimate interests as well as the right to data portability, to the extent that the processing of data does not result from the College's obligations under applicable law and in the public interest.

10.3. The data subject may submit a request for the exercise of his or her rights:

- in written form at the places of implementation of the College study programs (Lomonsova Street 4, Riga, LV-1003), presenting an identity document;
- by e-mail with a secure electronic signature.

10.4. Upon receipt of a Data Subject's request for the exercise of its rights, the College shall verify the Data Subject's identity, evaluate the request, and execute it in accordance with the law.

10.5. The College shall send a reply to the Data Subject by mail or electronically, taking into account, as far as possible, the manner in which the Data Subject has received a response.

10.6. The College shall ensure compliance with data processing and protection requirements in accordance with the law and, in the event of a Data Subject's objection, shall take all appropriate steps to resolve the objection.

10.7. In case of complaints, the Data Subject has the right to apply to the supervisory authority, the Data State Inspectorate.

11. THE CONSENT OF THE DATA SUBJECT TO THE PROCESSING OF THE DATA AND RIGHT TO WITHDRAW IT

11.1. The data subject shall have the right to withdraw his or her consent for data processing at any time by writing to the College's e-mail: info@managementCollege.eu or by telephone- +371 28007735, and in that case further data processing based on the prior consent for that purpose will no longer be carried out.

11.2. The withdrawal of consent shall not affect the processing of data carried out at the time when the data subject's consent was in force..

11.3. Withdrawal of consent shall not lead to the interruption of the processing of data carried out on the basis of other legal bases.

12. COMMUNICATION WITH DATA SUBJECT

12.1. The College communicates with the Data Subject using the contact information specified by the Data Subject (*telephone number, e-mail address, postal address*) using College Internet sites or apps.

12.2. The College shall communicate on the fulfillment of its obligations under the service contract on the basis of the contract concluded (*for example, coordination of services, information on contractual obligations and bills, planned jobs, changes in services, etc.*).

13. OTHER TERMINOLOGY

15.1. The College has the right to make supplements to the Privacy Policy by making available to the Data Subject its current version on his user profile, and by placing it on the College's home page.

15.2. The College maintains previous versions of the Privacy Policy and is available on the College's website.

Director

L.Sprūde