





## Your personal data: Information about graduate students

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<b>1</b>	<b>Summary</b>	
	1.1	Scope

This document applies to you, the graduate students of University of Cyprus (UCY) to inform you about:

-  the personal data we collect about you
-  how we process them
-  the safety we provide
-  your rights

The University of Cyprus ensures that the above is in line with the General Data Protection Regulation 2016/679 (EU).

<b>2</b>	<b>Policy</b>	
	2.1	Who we are?

The University of Cyprus (UCY) is the data controller in relation to the processing activities described below. This means that the University of Cyprus decides why and how your personal information is processed.

	<b>2.2</b>	What information do we collect about you and how do we collect it?
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**Information that you give to us:**

- 2.2.1** By registering with the University of Cyprus, we create a file in your name. In this file we add the information you give us when you register.
- 2.2.2** We hold general information about you, such as your name, address, modules and qualifications you gained, as well as data relating to examinations, assessments and course results. You may give us information about “special categories” of data, including your racial or ethnic origin, religious beliefs, physical or mental health, or sexual orientation. You might also give us information about your criminal convictions or/and genetic data.

**Information that we automatically collect:**

- 2.2.3** We automatically collect information about you when you enter the University's network, wired or wireless. Without this information, connection to the network is not possible. The University reserves the right to examine and manage your traffic information on the network for the purpose of protecting the IT network.

**Information we receive from third parties:**

- 2.2.4** Your necessary personal data will be submitted applying to the University of Cyprus for admission to a postgraduate program and / or a scholarship and / or a loan. We may also contact another organization or educational institution to confirm your qualifications or ask you to contact organizations and / or individuals to submit specific data and / or to certify information you have submitted.

<b>2.3</b>	<b>How do we process your personal data?</b>
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- 2.3.1** We collect and process a wide range of your personal data in order to deliver to you our services and to support you, to effectively manage our operations and meet our legal obligations.
- 2.3.2** We use the "special categories" of your data for activities such as: provision of equal opportunities or to determine if you need support. Information you may provide concerning about any disabilities and / or special requirements, maybe used to provide you with the necessary facilities to be able to meet your academic and / or research goals.
- 2.3.3** You may submit additional “special category” information to us, for example medical evidence for funding, information about your religion that may differentiate the way courses are attended, or examinations. We only use this information for the purpose for which it was provided.
- 2.3.4** We only process the personal data you provide us when we have a legal basis to do so.

The legal basis for processing your personal information are as follows:

- Consent has been given by you

- It is in the context for performing a contract we have with you
- Compliance of University of Cyprus with a legal obligation
- It is essential to protect your vital interest (humanitarian purposes e.g. epidemics, disaster response)
- It is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority of the University of Cyprus
- It is necessary for the purposes of legitimate interest pursued by University of Cyprus

The legal basis for processing your personal information is as follows:

<b>Personal Data Category</b>	<b>How it is collected</b>	<b>Purpose</b>	<b>Legal basis of processing</b>
Personal Data: Name, Address, date of birth	Application / Registration	To identify the student and to communicate with him/her	For the performance of the contract we have with you
Special categories of personal data  e.g. Religion, Nationality, Criminal prosecution, Health.	Application / Registration	Statistical reasons / equal opportunities / provision of facilities	For the exercise of the public and legitimate interest of the University  And through Consent
Data relating to course attendances	Course attendances	To monitor your attendance at lessons  Supporting Learning Objectives	For the performance of a task carried out in the public interest and purposes of the legitimate interests of the University
CCTV	Through the CCTV system of the University	To ensure a safe environment	Purposes of the legitimate interests of the University
Audiovisual (Video and Photos)	During ceremonies / conferences	For historical purposes / record keeping and for the promotion and visibility of the University	Purposes of the legitimate interests of the University
Ratings and feedback	Writing / Work, etc.	To measure your profitability	For the performance of the contract we have with you
Data relating to the use of the Library	Through your electronic access or through the	To manage courses and support the	For the performance of the contract we have with you

	lending of printed material	learning goals of the University	
Medical Data	Through the Academic Affairs and Student Welfare Service, and the Graduate School and referral process for evaluation	To provide support and security	For the performance of the contract we have with you  And through Consent
Criminal records and data relating to disciplinary offenses	Application / Registration or as a result of a court / competent body decision following an investigation	To determine whether students are eligible to attend courses	Performance of a task carried out in the public interest and for compliance with a legal obligation of the University
Degrees, rankings, research activity / publications and work experience	Application / Registration	To identify the student and evaluate the application for admission to a postgraduate program of study and / or scholarship	For the performance of the contract we have with you
Personal data  Name, Address, Date of Birth, Academic Qualifications	Application for Loan	To assess the loan request	For the performance of the loan agreement

**2.3.5** We undertake to achieve a fair and equitable process of your personal data, subject to the provisions of the General Data Protection Regulations (2016/679) and any amendments thereto by applying good practices for the protection of your personal data. Your personal information security is a priority for us and any transfer within the University aims to support learning, research and the provision of quality higher education to you.

### **Managing unwanted communications:**

**2.3.6** We will communicate with for the provision of our services and offer you the necessary support .

**2.3.7** We may also send you additional information about University of Cyprus, or invite you to take part of a survey to improve our services.

**2.3.8** If you do not wish to receive these information, you can communicate with us by using the information in Section 4.

	<b>2.4</b>	<b>Who do we share your information with?</b>
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**2.4.1** We share your personal data with a specific number of organizations for specific purposes. For example,

- By registering as a student we share information with the Student Union of the University of Cyprus, where you automatically become a member.
- We share data with government agencies in cases of performing a legal or regulatory obligation, e.g. in the context of a transnational agreement between Cyprus and Greece to provide meals to Greek students.
- Other organizations that promote co-operation or/ and provide support for students e.g. Student Welfare Association.
- With potential employers for the purpose of integrating students into the labor market.
- With the academic institutions you attended for the purpose of confirming your academic qualifications
- With the European Investment Fund for loan processing.

	<b>2.5</b>	<b>Other ways we may share your personal data:</b>
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We transfer your personal information if we are required to disclose or share it in order to comply with any legal obligation, identify or report a crime, enforce or apply the terms of our contracts or protect the rights, property or the safety of our visitors and students. However, we will always try to make sure that your privacy rights will continue to be protected.

	<b>2.6</b>	<b>Do we transfer your data outside of the European Union?</b>
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**2.6.1** In general, the information you provide us is stored on our secure servers or in applications based on systems located within the European Union.

**2.6.2** Information may be transferred outside the European Union if students go abroad participating in exchange programs / students mobility or potential employers for integration purposes in the labor market.

**2.6.3** You will be notified, if your personal data is transferred outside the European Union, all reasonable steps to ensure that the appropriate security measures as stated in Articles 45-46 of Regulation 2016/679 for the protection of your privacy rights will be taken in accordance with our policy. The ensuring will be done through the enforcement of contractual obligations on the recipient of your personal information.

	<b>2.7</b>	<b>How long do we keep your personal information for?</b>
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**2.7.1** The length of time we keep your personal data is determined by a number of factors such as: our purpose for using the information and our legal obligations.

**2.7.2** We have a retention schedule for information and we maintain identifiable records only if they have a legitimate or business purpose:

<b>Personal data included in the</b>	<b>Retention period</b>
Applications for admission to the University of Cyprus	While you are an active student of the University of Cyprus
Housing Applications	While you are an active student of the University of Cyprus
Requests for Facilities	While you are an active student of the University of Cyprus
Application for employment	While you are an active student of the University of Cyprus
Scholarship applications	8 years after the expiration of the scholarship, for examination by the Ministry of Finance or the Ministry of Education and Culture or for the issue of a certificate at the request of the grantee.
Loan Applications	8 years after repayment of the loan.
Lists of recipients of food vouchers	8 years after receipt of vouchers for inspection by the Ministry of Finance or the Ministry of Education and Culture or for the issuance of a certificate at the request of the student
Applications to the Student Welfare Association	While you are an active student of the University of Cyprus
Visa Issuance Details	While you are an active student of the University of Cyprus
Applications for Awards	For as long as the Award lasts for the donor to be informed or to issue a certificate at the request of the winner.
Intermediate Course Ratings	for 120 years
Final Course Ratings	for 120 years

	<b>2.8</b>	<b>Students' use of personal data</b>
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**2.8.1** Although students are not usually collecting or processing personal data during their studies at the University of Cyprus, however, if there is an imperative reason (such as assignment of a job / study or research activity) that makes processing of personal data necessary, this will be done after approval by the academic in authority of the program of study or research. In addition you must inform our Data Protection Officer, using the contact details in Section 4 of this document.

**2.8.2** If you do need to process personal data, the University of Cyprus will be the data controller for these activities as long as you have followed the advice in Section 2.8.1

above. Otherwise, you will be the data controller for the personal data you process, and you will be fully responsible for it.

	<b>2.9</b>	<b>Your rights</b>
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**2.9.1** The General Data Protection Regulation recognizes certain rights as the subject of personal data. The Regulation aims at strengthening the fundamental rights and freedoms of natural persons, in particular the protection of personal data and their free movement. For the exercise of any right, please contact us using the details in Section 4 of this document.

**2.9.2** Your rights are as follows:

- **Right to be informed:** You are entitled to be informed about the processing of your personal data, the reasons that they are collected or processed and by whom, and with whom we share your personal data. You are also entitled to receive copies of documents relevant to you.
- **Right of access:** You are entitled to request and obtain a copy of any information held about you by submitting a request for this purpose.
- **Right to rectification:** You are entitled to correct inaccurate or incorrect information as well as to fill in incomplete data concerning you.
- **Right to erasure:** When you no longer wish your personal data to be processed and maintained, you are entitled to request their deletion, provided that the data is not kept for a specific and legitimate purpose.
- **Right to restrict processing:** You are entitled to request to the controller to restrict the processing in case the accuracy of the data is challenged or when processing is illegal or the data controller no longer requires personal data for processing purposes or when the controller is about to delete them and you have reasons for keeping them.
- **Right to data portability:** You are entitled to receive data for further private use as well as to transfer personal data from one controller to another. You can ask the controller to provide you with your data in a commonly recognizable electronic format, as well as to directly send your data to another controller, if it's technically possible.
- **Right to object:** You are entitled to object the processing of personal data, at any time for personal reasons related to your specific personal situation. In addition, when your personal data is being processed for direct marketing (including profiling), you are entitled to object this processing.
- **Rights in relation to automated decision making and profiling:** You are entitled to oppose decisions based on automated processing of your personal data. You can ask for decisions to be made by natural persons and not just by computers.

If you are concerned about the way we have processed your personal information, you can complain either to the Personal Data Protection Officer of the University of Cyprus or to the Cypriot Commissioner for Personal Data Protection. Their contact details are listed below in Section 4.

<b>3</b>	<b>Glossary</b>
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***'personal data'***

means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

***«controller»:***

the University of Cyprus as a legal entity governed by public law which defines the purposes and the way of processing personal data.

***«recipient»:***

means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

***'genetic data'***

means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

***'biometric data'***

means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

***'data concerning health'***

means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

***'supervisory authority'***

means an independent public authority which is established by a Member State (Commissioner for Personal Data Protection)

***'Data Protection Officer'***

A Data Protection Officer is anyone who is involved, duly and in a timely manner, on all matters relating to the protection of personal data.



The Data Protection Officer who has the guarantee of independence monitors the compliance with the legislation and is at the same time the point of contact with the Supervisory Authority (Personal Data Protection Commissioner).

In addition to its compliance role through the use of accountability tools, the Data Protection Officer also acts as a intermediary between the various stakeholders (e.g. supervisors, data subjects and business units of the same organization).

**«Special categories of personal data»**

personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or membership of a trade union, as well as the processing of genetic data, biometric data for the unquestionable identification of a person, data concerning health or data relating to the sexual life of a natural person or sexual orientation.

	<b>4</b>	<b>Contact us</b>
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