Privacy policy for job applicants and partners of the UNWE

Information regarding the Controller:

Legal name	University of National and World Economy
BULSTAT	000670602
Seat and registered office	1700 Sofia, "Studentski" district, 19 "8th of December" street
Address of correspondance	1700 Sofia, "Studentski" district, 19 "8th of December" street rector@unwe.bg, Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
Phone number	(02) 8195 515; (02) 962 53 05
Website	www.unwe.bg

Information regarding the Data Protection Officer

Designation	"Vladimirov Kiskinov" Attorneys at Law
UIC/BULSTAT	176645870
Seat and registered office	City of Sofia, Naiden Gerov St. No. 6, Floor 4, Office 7
Address of correspondance	City of Sofia, Naiden Gerov St. No. 6, Floor 4, Office 7
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Information regarding the supervisory authority:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Phone number	(+359) 2 915 3 518
Webpage	www.cpdp.bg

University of National and World Economy (hereinafter referred to as "Controller", "the University" or "we") performs its activities in accordance with the Bulgarian Personal Data Protection Act and the EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals in regard to the processing of personal data and on the free movement of such data. This document aims to inform you about all aspects of the collection and processing of your personal data by the University and the rights you have, in relation to that.

Legal grounds for collecting, processing and storing your personal data

- **Art. 1.** The University collects and processes your personal data in regard with the conclusion and execution of contracts with the University on the grounds of Art. 6, para. 1, Regulation (EU) 2016/679 (GDPR), and more specifically on the following grounds:
- for taking steps at your request to conclude a contract if you are a candidate for employment;
- for fulfilling a contract or taking steps for concluding one with a partner;
- for compliance with a legal obligation that applies for the University;
- for the purposes of the legal interests of the Controller or a third party.

Objectives and principles for the collection, processing and storage of your personal data

- **Art. 2.** (1) During the conclusion of a contract with a partner legal entity, we collect and process personal data for the legal representative of the legal entity contract party, for the purposes of individualization the party in the contract and its execution. When concluding a contract with a partner a natural person, we collect and process personal data about his/her name, PIN, address, as well as contact data, for the purposes of individualization the party in the contract and its execution and establishing.
- (2) The contact details of the legal representative or contact officer are official information and as such are not considered personal data.
- **Art. 3. (1)** We collect and process the personal data that you provide us by applying for a job at the University, including for the following purposes:
- individualization of the candidate;
- making contact with you and proceeding with the communication;
- selection of candidates.
- (2) We keep your personal data that you have provided for a period of 6 months, and in case that we would like to continue storing your data after this period for the purposes of subsequent communication with you, we will send you by email request for providing us with your express consent for your data to continue to be stored.
- **Art. 4. (1)** In the course of collecting, processing and storing your personal data, the University adheres to the following Principles:

- lawfulness, fairness and transparency;
- limitation of processing purposes;
- proportionality with the processing purposes and data minimization;
- accuracy and relevance of the data;
- storage limitation in accordance with purpose achievement;
- integrity and confidentiality of the processing and ensuring an adequate level of security of the personal data.
- **Art. 5.** In course of processing and storage of personal data, the University can process and store personal data, in order to protect the following legitimate interests: including for the fulfillment of its obligations to state and municipal bodies:
 - fulfillment of obligations to the National Revenue Agency, the Ministry of Internal Affairs and other state and municipal bodies.

What types of personal data does the University collect, process and store

- **Art. 6.** (1) The University performs the following operations with the personal data provided by you as a job candidate, for the following purposes:
 - Conclusion and execution of an employment or civil contract: For the selection of job candidates, we process the personal data that you have sent us in your resume incl. names, email address, address, telephone, qualifications and work experience, education, etc
 - Conclusion of the impact assessment: Based on the impact assessment carried out, the operation "Conclusion and execution of an employment or civil contract" is permissible to carry out and provides sufficient guarantees to protect the rights and legitimate interests of data subjects in accordance with the requirements of the GDPR.
- (2) The Controller does not collect or process personal data relating to the following:
 - reveal racial or ethnic origin;
 - reveal political, religious or philosophical beliefs, or membership in trade unions;
 - genetic and biometric data, health data or data on sex life or sexual orientation.
- (3) The personal data are collected by the Controller from the persons to whom they relate.
- (4) The Controller does not collect and process data on the health status of job applicants, except after a selection has been made for the purposes of concluding an employment contract and determining appropriate working conditions.
- (5) The Controller does not perform automated decision-making with data.
- **Art. 7. (1)** The University performs the following operations with the personal data provided by you as legal representatives or proxies of legal entities-commercial partners, including as natural persons-partners, for the following purposes:
 - Conclusion and performance of a contract with a partner: For the conclusion and performance of a contract with a legal entity partner, we process only the three names of the legal representative or the person authorized by the company.

For the conclusion and execution of a contract with an individual - partner, we process data on names, the uniform civil number, address, telephone number, email address;

<u>Conclusion of the impact assessment:</u> Given the small volume of natural persons whose data is processed and given the limited volume of personal data that is collected, an impact assessment is not necessary for the current operation.

- (2) The personal data were collected by the Controller from the persons to whom they relate and from the Commercial Register at the Registration Agency.
- (3) The Controller does not perform automated decision-making with data.

Duration of storage of your personal data

- **Art. 8. (1)** The University stores your personal data as a job candidate for a period of no longer than 6 months. After the expiry of the period, the University shall take reasonable care to delete and destroy all your data without undue delay or to anonymize it (i.e., reduce it to a form that does not reveal your identity), unless you give your express consent to the data to continue to be stored and processed for the future.
- (2) In case that an unapproved job applicant has provided original or notarized copies of documents certifying physical and mental fitness, qualification degree, seniority or other circumstance, the University shall return these documents to the applicant within 6 months of completion of the selection.
- (3) The data of the University's partners are stored for a period of 5 years after the termination of the contract or for a longer period, in case of a judicial or administrative dispute, in order to protect the legitimate interests of the University. The data contained in tax and accounting documents are stored for the relevant period provided by law.
- (4) The Controller notifies you in the event that the data storage period needs to be extended in order to fulfill a legal obligation or in view of legitimate interests of the Controller or otherwise.

Transmission of your personal data for processing

- **Art. 9. (1)** The University may, at its own discretion, transfer part or all of your personal data to processors of personal data for the fulfillment of the processing purposes to which you have agreed, subject to compliance with the requirements of Regulation (EU) 2016/679 (GDPR).
- (2) The University notifies you in case of intention to transfer part or all of your personal data to third countries or international organizations.

Your rights in the collection, processing and storage of your personal data

Withdrawal of consent to the processing of your personal data

Art. 10. (1) If you do not wish all or part of your personal data to continue to be processed by the University for specific or all processing purposes, you may at any time withdraw your consent for processing by requesting in free text or filling in the form in Appendix No. 1, sent by email or on paper.

- (2) The University may ask you to prove your identity and identity with the data subject by asking you to provide an identity document at site.
- (3) The withdrawal of consent does not affect the validity of the processing of the personal data provided by you until the moment of withdrawal of consent.
- (4) The University may continue to process some or all of your data if there is a legal obligation to do so or for the purposes of protecting its legitimate interests.
- (5) In relation to the legal representatives and natural persons-partners under a contract with the University, para. 4.

Right of access

- **Art. 11.** (1) You have the right to request and receive confirmation from the University as to whether personal data relating to you is being processed.
- (2) The Controller may ask you to verify your identity and identity with the data subject by asking you to present an identity document on the spot.
- (3) You have the right to access the data related to you, as well as the information related to the collection, processing and storage of your personal data.
- (4) Upon request, the University shall provide you with a copy of the processed personal data relating to you in electronic or other appropriate form.
- (5) Providing access to the data is free of charge, but the University reserves the right to impose an administrative fee in case of repetitive or excessive requests.

Right to rectification or completion

Art. 12. (1) You have the right to request the University to:

- correct inaccurate personal data relating to you;
- to complete incomplete personal data related to you.
- (2) The Controller may ask you to verify your identity and identity with the data subject by asking you to present an identity document on the spot.

Right to erasure ("to be forgotten")

- **Art. 13. (1)** You have the right to ask the University to delete part or all of your personal data, and the University has the obligation to delete them without undue delay, when any of the following grounds are present:
 - the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - You withdraw your consent on which the data processing is based and there is no other legal grounds for the processing;
 - You object to the processing of your personal data and there are no overriding legal grounds for the processing;
 - personal data were processed illegally;

- personal data must be deleted in order to comply with a legal obligation under EU law or the law of a Member State that applies to the University;
- the personal data were collected in connection with the provision of information society services.
- (2) The University is not obliged to delete personal data if it stores and processes them:
 - to exercise the right to freedom of expression and the right to information;
 - to comply with a legal obligation that requires processing provided for in EU or Member State law that applies to the University or for the performance of a task in the public interest or in the exercise of official powers conferred on it;
 - for reasons of public interest in the field of public health;
 - for the purposes of archiving in the public interest, for scientific or historical research or for statistical purposes;
 - for the establishment, exercise or defence of legal claims.
- (3) In the event of exercising your right to be forgotten, the University will delete all your data, except for your unique social security number, for reporting purposes.
- (4) The data of the legal representatives and natural persons-partners under a contract with the University continue to be stored and processed, despite a request to be forgotten, on the grounds of compliance with a legal obligation of the University, to comply with the legitimate interest and the establishment, exercise or protection of legal claims.
- (5) In order to exercise your right to be forgotten, it is necessary to send a request in free text or to fill out a form according to Appendix No. 2 by e-mail or on paper, and to identify yourself with an identity document on the spot.

Right to limitation

Art. 14. You have the right to request the University to limit the processing of your data when:

- dispute the accuracy of the personal data, for a period that allows the University to verify the accuracy of the personal data;
- the processing is illegal, but you do not want the personal data to be deleted, but only to have its use restricted;
- The University no longer needs the personal data for the purposes of processing, but you require them to establish, exercise or defend your legal claims;
- You have objected to the processing pending verification of whether the University's legal grounds take precedence over your interests.
- (2) The Controller may ask you to verify your identity and identity with the data subject by asking you to present an identity document on the spot.
- (3) The Controller may continue processing your personal data if there is a need to establish, exercise or defend legal claims, for the protection of another natural person or due to important grounds of public interest.

Right of portability

- **Art. 15.** (1) If you have consented to the processing of your personal data or the processing is necessary for the performance of the contract with the University, or if your data is processed in an automated manner, you may, after identifying yourself to the University:
 - to ask the University to provide you with your personal data in a readable format and to transfer them to another Controller;
 - request the University to directly transfer your personal data to an Controller specified by you, when this is technically feasible.
- (2) The Controller may ask you to verify your identity and identity with the data subject by asking you to present an identity document on the spot.
- (3) You can exercise your right to portability by sending a request in free text or a completed form according to Appendix No. 3 by e-mail or on paper.

Right to receive information

Art. 16. You may request the University to inform you of all recipients to whom the personal data for which correction, deletion or restriction of processing has been requested has been disclosed. The University may refuse to provide this information if it would be impossible or would require a disproportionate effort.

Right to object

Art. 17. You may object at any time to the University's processing of personal data relating to you, including if it is processed for the purposes of profiling or direct marketing.

Your rights in the event of a breach of the security of your personal data

- **Art. 18.** (1) If the University detects a violation of the security of your personal data, which may create a high risk for your rights and freedoms, it will notify you without undue delay of the violation, as well as of the measures that have been taken or are about to be taken.
- (2) The University is not obliged to notify you if:
 - has taken appropriate technical and organizational measures to protect the data affected by the security breach;
 - has subsequently taken measures to ensure that the breach will not result in a high risk to your rights;
 - notification would require a disproportionate effort.

Persons, to whom your personal data is provided

Art. 19. For the described purposes of processing your personal data, the University is allowed to provide your personal data to third parties data processors, who comply with all requirements of legality and security when processing and storing your personal data.

Art. 20. The controller does not transfer your personal data to third States or international organisations, unless there is a ground for that and after the data subject has been duly informed.

Art. 21. In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone	+(359) 2 915 3 518
Website	www.cpdp.bg

Art. 22. You can exercise all your rights regarding the protection of your personal data via the forms attached to this Privacy notice. Of course, these forms are not obligatory and you can address your requests in any form, which contains a statement for that and identifies you as the data subject.

Appendix № 1

Exemplary forms of withdrawal of consent for processing purposes

Your name*:

Personal Identification Number*:	
Feedback data (e-mail, telephone) *:	
To	
Legal name	Student Council of the University of National and World Economy
BULSTAT	000670602
Seat and registered office	1700 Sofia, "Studentski" district, 19 "8th of December" street
Address of correspondance	1700 Sofia, "Studentski" district, 19 "8th of December" street
	rector@unwe.bg , Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
Phone number	(02) 8195 515; (02) 962 53 05
Website	https://sc.unwe.bg/
provided by me:	essing and storage of the following personal data,
☐ All personal data provided by me	
☐ Only these data	
For the following purposes:	
☐ Following purposes:	
☐ All purposes	

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cpdp.bg

Signature:																																
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Appendix № 2 –

Request "to be forgotten" - for erasure of personal data related to me

Your name*:

Personal Identification Number *:

Feedback data (e-mail, telephone) *:

To

Legal name	Student Council of the University of National and World Economy
BULSTAT	000670602
Seat and registered office	1700 Sofia, "Studentski" district, 19 "8th of December" street
Address of correspondance	1700 Sofia, "Studentski" district, 19 "8th of December" street
	rector@unwe.bg , Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
Phone number	(02) 8195 515; (02) 962 53 05
Website	https://sc.unwe.bg/

I request all personal data, which you are collecting, processing and storing, provided by me or third persons, which is related to me, according to the specified identification, to be erased from your database.

I declare that I am aware of the fact that all or part of my personal data may continue to be collected processed and stored from the collector for the purpose of performing legal obligations.

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592

Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cpdp.bg

Signature:									
Signature.	 		 	 	 	 • •	• •	 	

Appendix № 3 – Request for portability of personal data

Your name*:	
Personal identification number *:	
Feedback data (e-mail, telephone)*:	
To	
Legal name	Student Council of the University of National and World Economy
BULSTAT	000670602
Seat and registered office	1700 Sofia, "Studentski" district, 19 "8th of December" street
Address of correspondance	1700 Sofia, "Studentski" district, 19 "8th of December" street
	rector@unwe.bg , Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
Phone number	(02) 8195 515; (02) 962 53 05
Website	https://sc.unwe.bg/
I request all personal data related to me, velocities database to be sent to:	which has been collected, processed and stored in you
□e-mail:	
☐ Collector – recipient of the data:	
Name	
Identification number (UIN, BULSTAT, other)	
E-mail	
Please, transmit my personal data in the	following format:
\square XML	
□JSON	
□CSV	
□Other:	

I wish my personal data in the chosen format to collector:	to be transmitted to me or specified by me data		
\square to the specified e-mail			
\square to a physical carrier or electronic carrier (CI	D, DVD, USB)		
□ other:			
In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:			
Legal name	Commission for Personal Data Protection		
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592		
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592		

+(359) 2 915 3 518

www.cpdp.bg

Signature:

Telephone number

Website

Appendix № 4 –

Request for rectification of personal data

17		*
Your	name	4

Personal identification number *:

Feedback data (e-mail, telephone) *:

To

Legal name	Student Council of the University of National and World Economy
BULSTAT	000670602
Seat and registered office	1700 Sofia, "Studentski" district, 19 "8th of December" street
Address of correspondance	1700 Sofia, "Studentski" district, 19 "8th of December" street
	rector@unwe.bg , Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
Phone number	(02) 8195 515; (02) 962 53 05
Website	https://sc.unwe.bg/

I request the following personal data which you collect, process and store, provided by myself or third party, related to me, to be rectified as it follows:

Personal data, which shall be rectified:
I request the mentioned personal data to be rectified as it follows:

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518



Website	www.cpdp.bg
Signature:	