



Privacy notice for candidate students, students, PhD students, professors and visitors in UNWE

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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. (1) The University collects and processes personal data of the following categories of individuals in regard with conducting a candidate-student campaign, competitions for the acquisition of a PhD degree, implementation of a training process:

- Candidates for students;
- Students enrolled in full-time or part-time education to acquire a bachelor's or master's degree;
- Candidates for PhD studies;
- PhD students;
- Professors;
- Visitors to the University.

(2) The personal data of the specified persons is collected and processed on the grounds of Art. 6, para. 1 and Art. 9, para. 2 of Regulation (EU) 2016/679 (GDPR), and more specifically on the following grounds:

- For compliance with a legal obligation that applies to the Controller;
- For the performance of a task of public interest and implementation of official powers granted to the Controller;
- Your explicit consent to the processing of certain categories of personal data;
- To fulfill the obligations of the Controller under a contract with you or to take steps at the request of the data subject before concluding a contract;
- For the purposes of the legitimate interests of the Controller or a third party;
- To protect the vital interests of the data subject or another natural person.

(3) The University adopts Student Admission Regulations for each candidate campaign ("Student Admission Regulations") on the grounds of Art. 5 of the Ordinance on the state requirements for admission of students to Higher education institutions of the Republic of Bulgaria in connection with Art. 68, para. 1, item 2 of the Law on Higher Education, which defines the requirements and conditions for the admission of Bulgarian citizens and citizens of countries from the European Union and the European Economic Area, who have completed secondary education, for students at the University of National and World Economy.



(4) The University adopts the Regulations for the educational activities ("Regulations for the educational activities"), which determine the overall procedure for carrying out the education of the students, including PhD students, specialists and course students.

(5) The University carries out its activities in compliance with the requirements of the regulations and the application of the Law on Higher Education, published in State Gazette No. 112 of December 1995 and with all subsequent additions and amendments thereto, Resolutions of the Council of Ministers, as well as internal acts of the University bodies.

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

Art. 2. (1) In the course of collecting, processing and storing your personal data, the University collects and processes personal data for the purposes of registering a candidate in the electronic system for participation in a candidate student campaign, individualizing the candidate, making a contact, sending information to the candidate and making an assessment as to whether it meets the requirements set out in the Regulations.

(2) The University uses your data in an anonymized form that does not allow for your individualization, for the purposes of statistics and summarizing information about trends in candidate student campaigns.

Art. 3. The University collects and uses only your personal data as enrolled students, which is necessary for your individualization as a student of the University and for conducting the study process, providing administrative services and other activities necessary in the course of the student's studies.

Art. 4. The University collects and processes personal data of PhD candidates for the purposes of administering the process of holding a contest, ranking, announcing results, enrolment, as well as throughout the entire process of training and obtaining a PhD degree.

Art. 5. The University observes the following principles when processing your personal data:

- 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. 6. When processing and storing personal data, the University may process and store personal data, including for the fulfillment of its obligations to state and municipal bodies.

What types of personal data does the University collect, process and store about prospective students, newly admitted and enrolled students



Art. 7. (1) The University collects, processes and stores the following personal data for candidate students upon registration in the "Candidate Student Admission" electronic system by submitting an application for participation in conducting a candidate student exam on site in the University building or in the offices of partners in the country:

- three names of natural persons;
- identification number;
- address;
- identity card data - number, date of issuance, expiration date, issuing authority, citizenship;
- health status data;
- data on marital status;
- data on completed education;
- gender data;
- faculty number;
- personal number of a foreigner;
- student's grades;
- telephone number;
- citizenship and residence status;
- When conducting an online candidate-student entrance exam, in addition to the above data, the following data is also processed:
 - Entry number for the candidate-student campaign;
 - Identity card data;
 - Photo image;
 - Video image;
 - Audio recordings;
 - A six-digit code for future identification of the candidate, which is also used when digitally signing documents in regard with conducting of the exam;
 - Answers to additional questions authenticating the student candidate;

(2) The University performs the following operations with the personal data provided by you when registering in the electronic system as a candidate student:

- **Organization and conduction of candidate-student campaigns:** The University processes your personal data for 1) accepting and processing the application and the set of application documents, 2) creating a user profile in the "Candidate student admission" system for the relevant person for the purposes of identifying the individual as a candidate-student in the system and during the exam, 3) administration of the process of allocation of examination halls for the purpose of the alignment of students in the various examination halls/administration of the process of conducting online candidate-student entrance exams, 4) identification of the candidate student at the time of participation in the exam and for the purposes of preparation for the ranking of the results of the conducted personal exams for the purpose of assessing whether the results are sufficient for admission to the desired category of university studies at the University and 5) monitoring and assessing compliance with the rules and requirements when conducting online candidate-student entrance exams.

Conclusion of the impact assessment of the operation with personal data: Based on the above impact assessment, the personal data protection officer considers that the operation "Organization and conduction of candidate-student campaigns" is acceptable



for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

Art. 7. (1) The University processes personal data under Art. 6, para. 1 for candidate students upon submission of documents and applications for enrolment in the desired category of university studies after ranking in the relevant category of university studies. All personal data when enrolling in the picked category of university studies is transferred from the personal data already submitted in the candidate-student admission system and the University does not collect new personal data from the person.

(2) The University performs the following operations with the personal data provided by you when enrolling in the desired category of university studies after a successful ranking:

Enrollment of new university students: The current processing of personal data is performed by extracting the personal data from the already submitted data in the "Student Admission Candidate" system and transferring it to the "Student" system. The individual's personal data is used for registration of a newly enrolled student at the University and for the creation of his electronic student card.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Enrollment of newly enrolled students" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

Art. 8. (1) The University processes the personal data collected under Art. 6, para. 1 and Art. 7, para. 2 and contained in the "Student" system, in the course of the entire educational process and study in the relevant category of university studies picked by the student, and in certain cases it may also collect additional data (e.g. data on grades, marital status, etc.).

(2) The University performs the following operations with the personal data provided by you as a student enrolled full-time or part-time:

- **Administration of the educational process, exam grades and ranking for scholarships:** The purpose of the processing of personal data in the present operation is the service of the educational process at the University, including the conduction of training (including online training), conduction of exams (including online exams), compilation of examination reports, ranking for scholarships and dormitories, updating the student file in the general ledgers and the Student system, issuing certificates, academic references, service notes and other documents at the request of the student.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Administration of the educational process, exam grades and ranking for scholarships" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Graduation of students:** The University processes the data of its students, which are provided during enrolment, for the purposes of issuing a diploma for completed Higher education degree for the relevant category of university studies.



Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Graduation of students" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Bulgarian and foreign students exchange and recognition of diplomas issued abroad:** The University processes personal data of students who wish to apply for an exchange program, including the Erasmus program, for the purposes of participating in the ranking and implementing the exchange program, as well as students who have graduated from a foreign university and are applying for degree recognition. During this operation, additional data may be collected (e.g., bank account, foreign language data, etc.).

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Bulgarian and foreign students exchange and recognition of diplomas issued abroad" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Submission of an application and performance of ranking for dormitory accommodation** - The purpose of the operation is to accept applications from students for dormitory accommodation and performance of a ranking, depending on the student's grades and available places in the dormitory. The University performs the following processing of personal data within the framework of the present operation:
1. Accepting an application for applying for dormitory accommodation, from a student, electronically through the "Web student" information system; 2. Administration of the process of processing the submitted applications and preparing for ranking of students for the purposes of assessing whether the person's grades are sufficient for accommodation in a dormitory; 3. Ranking the results of the submitted applications. When performing the current operation and for the students' application for accommodation in a dormitory the University processes the following data: three names of natural persons; PIN; address on ID card; current address; ID card data - number, date of issuance, expiration date, issuing authority, citizenship; health data; marital status data; faculty number; contact telephone number; e-mail address; data about the students' grades. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR - processing is necessary to comply with a legal obligation that applies to the controller. Personal data of disabled persons is collected on the grounds of Art. 6, para. 1, letter "a" in relation to Art. 9, para. 2, letter "a" of the GDPR - express consent of the data subject to processing of their personal data for one or more purposes.

Conclusion of the impact assessment of the personal data operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Submission of an application and performance of ranking for dormitory accommodation" is acceptable for performance and provides sufficient guarantees for



the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Accommodation in a dormitory of classified persons, including candidate students and parents** - The purpose of the operation is acceptance of an accommodation card (accommodation letter for candidate students and their parents), identification of the accommodated person and administration of the accommodation process. The University performs the following processing of personal data within the framework of the current operation: 1. Acceptance of an application - accommodation card for accommodation in a dormitory on paper; 2. Identification of the individual as a student ranked for placement. When carrying out this operation and for the accommodation of students, including prospective students and parents, the persons present the following personal data: three names of natural persons; identification number; address on ID card; current address; ID card data - number, date of issue, date of validity, issuing authority, citizenship; faculty number; personal number of a foreigner; specialty; photographic image. The above personal data are processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR - processing is necessary to comply with a legal obligation that applies to the controller.

Conclusion of the impact assessment of the personal data operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Accommodation in a dormitory of classified persons, including candidate students and parents" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

Art. 9. (1) The personal data is collected by the University from the persons to whom they relate.

(2) The University does not perform automated decision-making with data.

(3) The University does not collect and process data for persons under the age of 14.

What types of personal data does the University collect, process and store for PhD applicants and enrolled PhD students

Art. 10. (1) The University collects and processes data for PhD candidates upon submission of an application for participation, as well as upon successful ranking and enrolment of the PhD student (e.g., names, address, PIN, telephone number, email, details of completed higher education and acquired educational and qualification degree, etc.).

(2) The University performs the following operations with the personal data provided by you as a candidate for the acquisition of a PhD degree:

- **Conducting contest for PhD students:** The purpose of the operation is to administer the process of conducting a contest for PhD students, ranking the participants in the contest, enrolling the PhD student in regular or part-time form, conducting the training process, passing exams, etc.



Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Conducting contest for PhD students" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

Art. 11. (1) The personal data is collected by the University from the persons to whom they relate.

(2) The University does not perform automated decision-making with data.

(3) The University does not collect and process data for persons under the age of 14.

What personal data of university professors does the University collect, process and store?

Art. 12. (1) The University collects and processes data about professors when administering contracts with professors at the University, including for organizing a study schedule, for preparing and processing business trips and for organizing transport and transportation to various events; for organizing holidays in rest stations at the university; to create a user account to access the systems; for holding contests for acquiring a scientific degree; for conducting scientific forums; for conducting competitions for filling an academic position; for issuing a reader's card and maintaining an information system, for organizing tournaments, competitions, championships and forums in the country and abroad, when registering and conducting courses; creating and maintaining a user profile of professors in the electronic system of the University, conducting studies, surveys and preparing reports, organizing other events, conducting exchange of professors (e.g. three names, social security number, phone number, email, including service email, ID card data, academic degree/position held, specialty, contract number with the University, health data, citizenship, gender, permanent and current address, contact person data, bank account, photographic image).

(2) The University performs the following operations with the personal data provided by you as professors:

- **Administration of contracts with professors at the University, including for the organization of a study schedule** - The purpose of processing personal data in this operation is to individualize the professors who teach at the University in the relevant specialties, maintain accurate and up-to-date information about the teaching personal and administer individual plans. The personal data processed to perform this operation includes three names, academic degree/position held, specialty. The University collects, stores and processes personal data during the administration of contracts with professors at the University, including for organizing a study schedule, on the grounds of Art. 6, paragraph 1, letter "b" of the GDPR – the processing is necessary for the fulfillment of a contract to which the teacher is a party, as well as for the fulfillment of legal obligations of the University in the organization of the educational process - art. 6, paragraph 1, letter "c" of the GDPR, as well as on the grounds of Art. 6, paragraph 1, letter "e" GDPR - processing is necessary in the exercise of official powers that have been granted to the Controller.



Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Administration of contracts with professors at the University, including for the organization of a study schedule" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Preparation and processing of secondment orders** – The purpose of the operation is to consider, approve the secondment of an employee or a person on a civil contract and draw up a secondment order in accordance with the requirements of the applicable legislation. The personal data processed to perform this operation includes three names, position, identity card data, passport data. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "b" of the GDPR - the processing is necessary for the purposes of performing a contract to which the data subject is a party.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Preparation and processing of secondment orders" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Organization of transport and transportation** – The purpose of personal data processing in this operation is the organization and transportation of university employees for a business trip, participation in an event in another place/area, etc. The personal data that is processed to perform this certain operation includes three names and the position held. Personal data of the individuals who are transported for a business trip, participation in an event or otherwise, is processed on the grounds of the performance of a concluded employment contract - Art. 6, paragraph 1, letter "b" of the GDPR or express consent of event participants or guests for whom transportation is organized - art. 6, paragraph 1, letter "a" of the GDPR.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Organization of transport and transportation" is permissible for performance and provides sufficient guarantees to protect the rights and legitimate interests of data subjects in accordance with GDPR requirements.

- **Organization of vacations in rest stations at the university** – The purpose of personal data processing in this operation is the administration of the process of processing the applications and accommodation in the Educational and rehabilitation bases of the UNSS of employees of the University, members of their families or third parties. The personal data processed for this operation includes three names, PIN, identity card data, address, official position and work experience of the individual. The University processes personal data for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to the conclusion of the contract – Art. 6, para. 1, letter "b" of the GDPR.

Conclusion of the assessment of the impact of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation



"Organization of vacations in rest stations at the university" is acceptable for performance and provides sufficient guarantees to protect the rights and legitimate interests of data subjects in accordance with GDPR requirements.

- **Creating a user account for access to the systems** - The purpose of the operation is to create an account for employee's access to information resources, services or network infrastructure of the University. The personal data that are processed within this operation includes two names and the work e-mail of the university professor. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR - processing is necessary to comply with a legal obligation that applies to the Controller.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Creating a user account for access to the systems" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Conducting contests for the acquisition of a scientific degree** - The purpose of the operation is to administer the process of conducting a contest for the acquisition of a scientific degree. Within this operation, the following types of personal data are processed: three names; PIN, date and place of birth; citizenship; address; level of foreign language proficiency; phone number; e-mail address; identity card data, state of health; criminal record; teaching experience, held academic position; Educational and Scientific Degree; bank account data. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR - processing is necessary to comply with a legal obligation that applies to the controller.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Conducting contests for the acquisition of a scientific degree" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Conducting scientific forums** – The purpose of the operation is administration of the process of conducting scientific forums. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "a" of the GDPR - the data subject has given consent to the processing of his personal data for one or more specific purposes.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Conducting scientific forums" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).



Conducting contests for an academic position - The purpose of the operation is administration of the process of holding a contest for an academic position. During the operation, the following personal data is processed – three names, address; phone number; e-mail address; health condition; criminal record; teaching experience; academic position; Educational and Scientific Degree; Bank account data. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR – processing is necessary to comply with a legal obligation that applies to the controller.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Conducting contests for an academic position" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Issuing a reader's card and maintaining an information system** - The purpose of the operation is to accept an application for issuing a reader's card, identify the applicant and issue a reader's card. In order for university to perform this operation, the following personal data is processed – three names; PIN, department affiliation, photographic image; specialty. The purpose of the operation is to accept an application for issuing a reader's card, identify the applicant and issue a reader's card and provide books to readers. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "b" of the GDPR – processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to the conclusion of a contract.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Issuing a reader's card and maintaining an information system" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Organization of tournaments, competitions, championships and forums in the country and abroad** - The data is processed for the purposes of identifying the university professor for his registration for participation in a tournament or competition at his request and holding tournaments in the country and abroad. The personal data processed for the purposes of this operation includes three names of natural persons, PIN, job details, address, telephone number, e-mail. The University collects, stores and processes personal data for registration and participation in tournaments and competition – based on the express consent of the data subject, according to Art. 6, paragraph 1, letter "a" of the GDPR.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Organization of tournaments, competitions, championships and forums in the country and abroad" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).



- **Enrollment and conduction of courses** - The data is processed for the purposes of identifying the university professor for enrolment and conduction of a certain type of courses. Personal data processed for the purposes of implementing this operation includes three names, faculty number, course, specialty, position. The University collects, stores and processes personal data for concluding and executing a contract or taking steps to conclude a contract – Art. 6, paragraph 1, letter "b" of the GDPR.
Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Enrollment and conduction of courses" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).
- **Bulgarian and foreign students and university professors exchange and recognition of diplomas issued abroad** - The data is processed for the purposes of organizing a ranking of university professors for foreign universities at their request for the relevant term. The personal data processed to fulfill the purposes of this operation include three names, unique civil number, date of birth, identity card data (number, date of issue, etc.), marital status, citizenship, gender, permanent and current address, telephone, email, major, faculty number, contact person details, bank account, photographic image, faculty number. The University collects, stores and processes personal data for taking actions to conclude a contract at the request of the subject and execution of a contract after the successful ranking of the relevant teacher – Art. 6, paragraph 1, letter "b" GDPR.
Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Bulgarian and foreign students and university professors exchange and recognition of diplomas issued abroad" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

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

Art. 12. (1) The University collects and processes visitor data when visiting premises, bases and other sites of the University, when participating in the study schedule and classes or events, conferences and any other type of event organized by the University (e.g., three names, PIN, phone number, email, photographic image).

(2) The University performs the following operations with the personal data provided by you as a visitor:

- **Organization of events, including tournaments, competitions, championships and forums in the country and abroad** – The collected personal data is processed for the purpose of identifying the visitor for his registration for participation in a tournament or competition at his request and conducting tournaments in the country and abroad. The personal data processed for the purposes of this operation includes three names of natural persons, PIN, address, telephone number, email. The University collects, stores and processes personal data for registration and participation in tournaments and competitions based on the express consent of the data subject, according to Art. 6, paragraph 1, letter "a" of the GDPR.



Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation „Organization of events, including tournaments, competitions, championships and forums in the country and abroad" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Conducting studies, surveys and preparing reports** - The purpose of processing personal data when conducting studies, surveys and preparing reports is to periodically check and monitor the services provided by the University and the quality of education, assessing the standards of education maintained, assessment of visitors' opinion about educational services, preparation of quality improvement proposals and others. The personal data of the visitors collected regarding the performance of this operation represent the information provided by the respondents, which is not individualizing, but refers to their personal opinion. The University collects, stores and processes personal data of visitors for the performance of this operation based on the fulfillment of the University's legal obligation to maintain the quality of education – art. 6, paragraph 1, letter "f" GDPR in relation to Art. 6 of the Law on Higher Education, as well as on the grounds of Art. 6, paragraph 1, letter "e" GDPR – processing is necessary in the exercise of official powers that have been granted to the Controller.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Conducting studies, surveys and preparing reports" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Issuing a reader's card and maintaining an information system** - The purpose of the operation is to accept an application for issuing a reader's card, identify the applicant and issue a reader's card. In order for the University to perform the operation, the following personal data is processed – three names, PIN, photographic image, specialty. The purpose of the operation is to accept an application for issuing a reader's card, identify the applicant and issue a reader's card and provide books to readers. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter “b” of the GDPR – processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to the conclusion of a contract.

Conclusion of the impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Issuing a reader's card and maintaining an information system" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

- **Access and usage of documents from the Central Archive of the UNSS** – The purpose of the operation is to provide access to the accepted documents in the Central Archive of the UNSS. When performing this operation and for the purposes of using the accepted documents in the central archive of the UNSS, the following personal



data is collected: data on names of natural persons, PIN, job details, address details, telephone number and fax details, email details. The above personal data is processed by the University on the grounds of Art. 6, para. 1, letter "c" of the GDPR – processing is necessary to comply with a legal obligation that applies to the Controller.

Conclusion of the impact assessment of the operation with personal data: Based on the above impact assessment, the personal data protection officer considers that the operation "Access and usage of documents from the Central Archive of the UNSS" is acceptable for performance and provides sufficient guarantees for the protection of the rights and legal interests of data subjects in accordance with Regulation (EU) 2016/679 (GDPR).

What specific visual personal data does the University store

Art. 12. (1) The specific personal data is included in an image of the natural persons (visual or audiovisual image of the natural persons) - students, teachers, employees and other guests and visitors of the University. Personal data for an image of a natural person is stored for a period of 2 months on the grounds of Art. 56, para. 4 of the Bulgarian Law on Private Security Activities and until the legitimate interest of the University ceases in the cases of control over the fulfillment of the duties of employees and teachers in their labor relations with the University and labor discipline.

(2) The above-mentioned personal data is processed by the "Security Organization" sector, and the processing operation represents a complete administration of the image data of natural persons (video recordings) from the means of video surveillance, their recording, preservation and usage for the needs and purposes of the University.

(3) The data for all persons who are captured by the means of video surveillance on the territory of the University is processed on the grounds of the legitimate interest of the University and Art. 56, para. 4 of the Bulgarian Law on private security activities, and is processed for the purposes of ensuring the security of students, teachers, employees and visitors of the University, as well as for the purposes of monitoring the performance of the work duties of employees and university professors, including the establishment of violations and the imposition of disciplinary sanctions – in accordance with Regulation (EU) 2016/679 (GDPR). Art. 6, paragraph 1, b.

(4) When providing samples of image data of natural persons, all necessary measures (as far as possible and as far as the software allows) are provided to delete the data of the persons who are not subject to verification by the Controller.

(5) Upon a duly submitted written request for the provision of data from extracts from records, the same shall be provided after an express order of the Rector of the University.

Terms of personal data storage

Art. 13. (1) The University stores your personal data as a student candidate for the entire duration of the candidate student campaign for which you signed up and for a period of up to 5 years after its completion, after which the University takes the necessary actions to delete



and destroy all your personal data without undue delay or to anonymize it (i.e., reduce them to a form that does not reveal your identity) and delete your profile in the electronic system.

(2) The University stores your personal data, which you provided when registering as a newly enrolled student, for the entire duration of your studies. After the student's graduation, the data is archived and stored indefinitely for the purposes of protecting the University's legitimate interests.

(3) The University stores your personal data, which you provided when enrolling as a PhD candidate and enrolled PhD student, for the entire duration of the studies and until the acquisition of the relevant PhD degree. After the expiration of this period, the data is archived and stored indefinitely for the purpose of protecting the legitimate interests of the University.

(4) The University notifies you in case that the data storage period needs to be extended in order to fulfill a legal obligation or in view of legitimate interests of the University or otherwise.

Transmission of your personal data for processing

Art. 14. (1) The University is allowed on its own discretion to transmit all or part of your personal data to processor for performing the purposes of processing, which you have agreed in compliance with the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The University informs you in case of intention to transmit all or part 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. 15. (1) If you do not wish the University to continue to process all or part of your personal data, which are processed on the ground of given consent, for specified or all processing purposes, you can, at any time, withdraw your consent for processing by sending a request, incorporated in free text, or to fill the form in Appendix No 1, sent by email or on paper.

(2) The University is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting an Identity Card on site.

(3) The withdraw of the consent does not affect the examination of the processing of the personal data, provided by you until the moment of the withdraw of the consent.

(4) You can at any time withdraw your consent for processing your personal data for the purposes of direct marketing.

(5) The University is allowed to continue to process all or part of your personal data, if there is a legal obligation for the processing or for the purposes of protection of the University's legal interests.

Right of access



Art. 16. (1) You have right to request and receive confirmation from the University if there is a processing of personal data, related to you.

(2) The University is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning, by presenting Identity Card on site.

(3) You have right to gain access to the data, related to you, as well as to the information, regarding collecting, processing and storage of your personal data.

(4) The University provides you, if there is a request from you, a copy of the processed personal data, related to you, in electronic or other appropriate form.

(5) Provision of data access is free, but the University keeps his right to determine administrative fee, in case of repeatability or excessiveness of the requests.

Right of correction or completion

Art. 17. (1) You have right to request from the controller to:

- to correct the inaccurate personal data, concerning you;
- to complete incomplete personal data, concerning you.

(2) The University is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning by presenting an Identity Card on site.

Right to erasure ("to be forgotten")

Art. 18. (1) You have the right to request 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 is 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 it:

- For exercising the right of freedom of speech and the right of information;
- For compliance with legal obligation, which requires processing, determined in European Union Law or the law of Republic of Bulgaria, which obligation is in force against the Controller or for performance of a task in public interest or for performance of official powers, provided to the Controller;



- In public interest, related to the public health;
- For the purposes of archiving in public interest, for scientific or historic researches or for statistics purposes;
- For 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) In order to exercise your right to be forgotten, it is necessary to send a request in free text or fill out a form according to Appendix No. 2 by e-mail or on paper, and identify yourself with an identity document on the spot.

Art. 19. (1) You have right to request the Controller to restrict the processing of the personal data, concerning you, when:

- The accuracy of the personal data is contested by you, for a period, which allows the Controller to check the accuracy of the data;
- The processing is unlawful, but you oppose the erasure of personal data, and request only for the restriction of their usage;
- The Controller no longer needs the personal data for the purposes of the processing, but you require them for establishment, exercise or defence of legal claims;
- You objected to the processing pending the verification whether the legitimate grounds of the controller override your legal interests.

(2) The Controller is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting on site- an Identity Card.

(3) The Controller is allowed to continue the processing of your personal data, if there is a necessity for establishment, exercise or defence of legal claims, defence of another natural person or in accordance with important requirements of public interests.

Right of portability

Art. 20. (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) You can exercise your right to portability by sending a request in free text or a completed form according to Appendix No. 3 by email or on paper.

Right to receive information



Art. 21. You have the right to require from the Controller to inform you about all recipients, to whom your personal data, for which has been required rectification, erasure or restriction of processing, have been disclosed. The Controller is allowed to refuse to provide this information if this is impossible or involves disproportionate effort.

Right to object

Art. 22. You have the right to object at any time to processing of personal data concerning you including processing for the purpose of profiling or direct marketing.

Your rights in case of personal data breach

Art. 23. (1) If the Controller detects personal data breach, which is likely to result in a high risk to your rights and freedoms, the University communicates the personal data breach to you without undue delay, as well as the measures taken or proposed to be taken.

(2) The Controller is not obliged to inform you if:

- the Controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach;
- the Controller has taken subsequent measures which ensure that the high risk to your rights is no longer likely to materialize;
- it would involve disproportionate effort.

Persons, to whom your personal data is provided

Art. 24. 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. 25. 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. 26. 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.cdpd.bg

Art. 27. 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/

I withdraw my consent for collection, processing and storage of the following personal data, provided by me:

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.cdpd.bg

Signature:

**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.cdpd.bg

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, which has been collected, processed and stored in your database to be sent to:

e-mail:

Collector – recipient of the data:

Name

Identification number (UIN, BULSTAT, other)

E-mail

Please, transmit my personal data in the following format:

XML

JSON

CSV

Other:



I wish my personal data in the chosen format to be transmitted to me or specified by me data collector:

to the specified e-mail

to a physical carrier or electronic carrier (CD, 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
Telephone number	+(359) 2 915 3 518
Website	www.cdpd.bg

Signature:



Appendix № 4 –

Request for rectification 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 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.cdpd.bg

Signature: