

Privacy notice for the Student's Council of the UNWE

Information regarding the Controller:

Legal name	Student's 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/

Information regarding the jointly 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
Phone number	+ 359 2 988 18 28
E-mail	DPO @vladimirov-kiskinov.eu

Information regarding the Supervisory authority:

Legal name	Commission for Personal Data Protection
Seat and registered office	S
Address of correspondence	S
Phone number	(
Webpage	



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 with 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 processing.

Legal grounds for collecting, processing and storing your personal data

Art. 1. (1) The Student's Council collects and processes your personal data in regard with organizing and conducting elections for the Student's Council of the UNSS, performing the obligations of the Student's Council on the representation of students and PhD students from the University, including through participation in the official bodies of the University, organizing events and campaigns, forming specialized student groups and communities, conducting studies, publishing information about the Student's Council team on the website http://sc.unwe.bg/ and making inquiries on the website of the Student's Council on the grounds of Art. 6, para. 1 of Regulation (EU) 2016/679 (GDPR), and more specifically on the following grounds:

- For compliance with a legal obligation that applies to the Student's Counsel as a Controller;
- Your explicit consent to the processing of certain categories of personal data;
- For the purposes of the legitimate interests of the Controller or a third party;
- (2) The Student's Council of the University performs its activities in compliance with the requirements of the regulations and the application of the Bulgarian Law on Higher Education, published in Official State Journal, issue No. 112 of December 1995 and with all subsequent additions and amendments to it, the Ordinance on State Requirements for Acquiring Higher Education by educational and qualification degrees, Resolutions of the Council of Ministers, as well as the internal Regulations of the University and decisions of the Academic Council. The Student's council has adopted internal Regulations for its organization and activities in connection with Art. 72, para. 2 and para. 3 of the Law on Higher Education, which determines the conditions and procedure by which students and PhD students at UNSS elect their representatives in the Student's Council, as well as the overall activity of the Student's Council.

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

Art. 2. (1) The Student's Council collects, processes and stores your personal data for the purposes of organizing and conducting elections for representatives of students and PhD students in the Student's Council, including for the following purposes:



- registration of a candidate for participation in the Student's Council elections;
- preparation of election materials;
- announcement of election results;
- identification of the members of the Student's Council;
- individualization of students and PhD students who have exercised their right to vote for members of the Student's Council;
- organizing internal elections in the Student's Council;
- statistical purposes;
- for the purposes of the legitimate interests of the Controller or a third party;
- response to inquiries;
- publication of publicly available information about the Student's Council team on the Controller's website;
- publishing available information about candidates for Student's Council members on the Controller's website;
- (2) The Student's Council collects, processes and stores personal data for students, PhD students and university professors for the purposes of performing its activities, including organizing events and campaigns, organizing specialized student groups and communities, conducting studies and surveys, and others.
- **Art. 3. (1)** In the course of collecting, processing and storing your personal data, the Student's Council 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. 4.** In course of processing and storage of personal data, the Student's Council can process and store personal data, including for the fulfillment of its obligations to state and municipal bodies.

What types of personal data does the Student's Council collects, processes and stores

- **Art. 5.** The Student's Council performs the following operations with the personal data provided by you for the following purposes:
 - Organizing and conducting elections the purpose of the operation is to exercise the right of students and PhD students to vote and to be elected for the governing bodies of the University of National and World Economy, including for the purposes of registering a candidate for participation in the Student's Council elections, preparation of election materials, identification of students and PhD students who have exercised



their right to vote for members of the Student's Council, announcement of election results, as well as conducting internal elections. In individual cases, the purpose of the operation may also be to protect the legitimate interests of the Student's Council.

Student's Council collects and processes your personal data in the capacity of Joint Controller.

<u>Conclusion of Data protection impact assessment of the operation:</u> Based on the above impact assessment, the personal data protection officer considers that the operation "Organizing and conducting elections" 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).

- Processing of inquiries made through the contact form on the website http://sc.unwe.bg/ Student's Council processes your personal data as a Controller to identify the data subject as the inquirer and send a reply to the inquiry. Given the small volume of natural persons whose data is processed and given the limited volume of personal data that is collected, conducting an impact assessment is not necessary for the current operation.
- Publishing information about candidates for members and the Student's Council team on the Controller's website the purpose of this operation is to publish accessible information for identifying and contacting the Student's Council team, as well as for candidates for Student's Council members. Given the small volume of natural persons whose data is processed and given the limited volume of personal data that is collected, conducting an impact assessment is not necessary for the current operation.
- Administration of the activity of the Student's Council the purpose of the processing of personal data in this operation is to serve the process of administration of documents in regard with the implementation of the activity of the Student's Council. Given the small volume of natural persons whose data is processed and given the limited volume of personal data that is collected, conducting an impact assessment is not necessary for the current operation.
- Organizing and conducting events the purpose of this operation is to organize and conduct events, forums and campaigns, independently or jointly with the University or other organizations aimed at the development of the student society.
 Conclusion of Data protection impact assessment of the operation: Based on the above impact assessment, the personal data protection officer considers that the operation "Organizing and conducting other events" 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. 6. (1)** The Student's Council processes the following categories of personal data and information for the following purposes and on the following grounds:
 - Data of members and candidates for Student's Council members: (names, PIN, address, faculty number, university specialization, degree, email address, faculty, telephone number, photographic image).
 - ✓ **Purpose for collection of personal data:** 1) identification of the individual as a candidate for Student's Council member, 2) identification of the individual as a student/PhD student at the University of National and World Economy, 3) ability to provide a contact with the individual and 4) selection of the person as a member and his inclusion in the composition of the Student's Council with a view for performance of the activity and fulfilling his duties of the council.

Grounds for collection of your personal data - The data is processed on the grounds of compliance with a legal obligation that applies to the Controller – Art. 6, para. 1, b. (c) GDPR; The data published on the website of the Student's Council are processed on the grounds of explicit consent - Art. 6, para. 1, letter "a" GDPR.

- Data of the students and PhD students with rights to vote for members of the Student's Council (names, faculty number, faculty):
 - ✓ **Purpose for collecting personal data:** 1) identification of the individual as a student or PhD student at the University of National and World Economy, entitled to participate in voting and 2) identification of the students and PhD students who exercised their right to vote.

Grounds for processing your personal data - Your data for participation in the elections for members of the Student's Council is processed on the grounds of compliance with a legal obligation that applies to the Controller - art. 6, para. 1, letter "c" GDPR.

- Personal data for making an inquiry through the contact form on the website of the Student's Council (names and email address):
 - ✓ **Purpose for collecting personal data:** 1) establishing a contact with the individual who is making the request and sending information to him and 2) for the purposes of sending a response.

Grounds for processing your personal data - Your data for making an inquiry is processed on the grounds of your express consent - art. 6, para. 1, letter "a" GDPR.



- Data processed when participating in an event organized by or jointly with the Student's Council (names, email address, major, course, etc.):
 - ✓ **Grounds for collection of your personal data** 1) making a contact with the participant in the event and 2) making a registration for participation, in case registration for the event is planned.

Grounds for processing your personal data - Your data for participation in an event is processed on the grounds of your express consent - art. 6, para. 1, letter "a" GDPR.

- (2) The Student Counsel does not collect and process personal data, regarding the following:
 - revealing racial or ethnic origin;
 - revealing political, religious or philosophical beliefs, or trade union memberships;
 - genetic and biometric data, data, concerning health or sexual life or sexual orientation.

except on the grounds provided for in the GDPR.

- (3) The personal data are collected by the Controller from the persons, whom it concerns.
- (4) The Controller does not make automatic data decision making.
- (5) The Student's Council does not collect or process personal data for persons under the age of 16.

Terms of personal data storage

- **Art. 7. (1)** The Student's Council stores your personal data as candidates for Student's Council members according to the statutory terms. After the end of the elections, the personal data regarding the candidates which are not selected is archived and stored indefinitely for the purpose of protecting the legitimate interests of Student's Councils.
- (2) The Student's Council stores your personal data as members of the Student's Council throughout the term of Student's Council's mandate. After the expiration of the mandate, the personal data is archived and stored indefinitely for the purposes of protecting the legitimate interests of the Student's Council.
- (3) The Student's Council stores the personal data of individuals who have made an inquiry through the contact form on the website of the Student's Council, until the express withdrawal of the given consent by the person or a period of up to 1 year from the last communication with the person.
- (4) The Student's Council stores the personal data of individuals participating in events, forums and campaigns organized by the Student's Council for the entire duration of the event and until the consent to provide the data is withdrawn.



Transmission of your personal data for processing

- **Art. 8. (1)** The Student Counsel 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 Student Counsel 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 course of collection, processing and storage of your personal data

Withdraw of the consent for processing of your personal data

- **Art. 9. (1)** If you do not wish the Student's Council 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 Student's Council 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 Student's Council 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 Student's Council legal interests.

Right of access

- **Art. 10.** (1) You have right to request and receive confirmation from the Students Council if there is a processing of personal data, related to you.
- (2) The Students Council 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 Students Council 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 Students Council keeps his right to determine administrative fee, in case of repeatability or excessiveness of the requests.



Right of correction or completion

Art. 11. (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 Student's Council 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. 12. (1) You have the right to request the Student's Council to erase all or part of your personal data, and the Student's Council has the obligation to erase such data without undue delay, when one of the following grounds applies:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You have withdrawn your consent on which the processing is based and where there is no other ground for processing;
- You have objected to the processing of personal data, relating to you, and there are no legal grounds for the processing, which have advantage;
- Personal data have been processed illegally;
- Personal data shall be erased with the purpose of legal obligation under European Union Law or the law of Republic of Bulgaria, which obligations are in force against the Controller;
- Personal data have been collected in connection with the offer of services of information society.
- (2) The Controller is not obliged to erase the personal data, if he keeps and processes them:
 - 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 case that the grounds, described in art. 1, are present, the Student's Council will erase all your personal data, except your Personal identification code (PIN), for the purposes of accountability.



(4) To exercise your right to be forgotten, you shall send a request in free written form or to fill in the form in accordance with Appendix No 2 by email or on paper, and you shall identify yourself by presenting an Identity card.

Right to restriction of processing

Art. 13. (1) You have right to request the Students Council 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 Students Council 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 Students Council 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 Students Council 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. 14. (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 Student's Council, or if your data is processed in an automated manner, you may, after identifying yourself before the Student's Council:
 - ask the Student's Council to provide you with your personal data in a readable format and to transfer them to another Controller;
 - ask the Student's Council to directly transfer your personal data to an Controller specified by you, when this is technically feasible.
- (2) You can exercise your right of 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. 15. You have the right to require from the Student's Council 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 Student's Council is allowed to refuse to provide this information if this is impossible or involves disproportionate effort.

Right to object

Art. 16. 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. 17. (1) When the Student's Council 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 Student's Council is not obliged to inform you if:

- the Student's Council has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach;
- the Student's Council 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. 18.** 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. 19.** 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. 20.** 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. 21. 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.



Exemplary forms of withdrawal of consent for processing purposes

Your name*:									
Personal Identification Number*:									
Feedback data (e-mail, telephone) *:									
To									
Legal name	Student's 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, process provided by me:	ssing and storage of the following personal data,								
\square All personal data provided by me									
☐ Only these data									
For the following purposes:									
☐ Following purposes:									

 \square 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:													
------------	--	--	--	--	--	--	--	--	--	--	--	--	--



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's 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:																			•								•	
------------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	---	--	--	--	--	--	--	--	---	--



Appendix № 3 – Request for portability of personal data

Your name*:

Personal identification number *:	
Feedback data (e-mail, telephone)*:	
To	
Legal name	Student's 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 database to be sent to:	ch has been collected, processed and stored in your
□e-mail:	
☐ Collector – recipient of the data:	
Name	
Identification number (UIN, BULSTAT, other)	
E-mail	
Please, transmit my personal data in the follo	owing format:
\square XML	
□JSON	
□CSV	



□Other:	
I wish my collector:	personal data in the chosen format to be transmitted to me or specified by me data
☐ to the sp	pecified e-mail
□ to a phy	sical 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.cpdp.bg

Signature:



Appendix $N_2 4$ – Request for rectification of personal data

Your name*:
Personal identification number *:
Feedback data (e-mail, telephone) *:

To

Student's Council of the University of National and World Economy
000670602
1700 Sofia, "Studentski" district, 19 "8th of December" street
1700 Sofia, "Studentski" district, 19 "8th of December" street
rector@unwe.bg , Prof. Dr. Dimitar Dimitrov, Rector of University of National and World Economy
(02) 8195 515; (02) 962 53 05
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:	
------------	--