

RULES ON EMPLOYEE PERSONAL DATA PROCESSING

APPROVED

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In the framework of its employment relationship, RISEBA collects and processes employees' personal data.

1. Personal data controller

RISEBA University of Applied Sciences (Reg. No. 40003090010), 3 Meža Street, Riga, Latvia.

2. Categories of personal data, purpose of processing, legal basis

Data type	Purpose	Legal basis (article of the Regulation)	Duration of storage	Recipients of personal data (third parties)
name, surname, identification number, position held	To enter an employment contract	Article 6(1)b of the Regulation*	throughout the term of the contract; in accordance with regulatory requirements	• insurance company • occupational doctor • occupational safety company
place of residence	To enter an employment contract	Article 6(1)b of the Regulation*	throughout the term of the contract; in accordance with regulatory requirements	• insurance company • occupational doctor
nationality, name, surname	generating statistics	Article 6(1)c of the Regulation*	in accordance with regulatory requirements (employee card)	Ministry of Education (National Education Information System) In the statistical results of personal data processing, RISEBA only publishes non-personal information.
personal phone number, personal email address	ensuring the efficacy of personnel and their management process (internal communication, personnel management)	Article 6(1)f of the Regulation*	throughout the term of the contract and 3 months after the end of the employment relationship (for communication on	none

			matters pertaining to the position and employment)	
bank account	to enter an employment contract	Article 6(1)b of the Regulation*	throughout the term of the contract; in accordance with regulatory requirements	none
passport / ID card	to enter an employment contract	Article 6(1)b of the Regulation*	not stored, used only for employee identification	none
documents certifying education	regulatory requirements	Article 6(1)c of the Regulation*	in accordance with regulatory requirements	none
information about the employee's education, skills, experience and employment history	evaluation of suitability for the position	Article 6(1)f of the Regulation*	throughout the term of the contract; in accordance with regulatory requirements	none
information pertaining to criminal record	applies only to academic personnel	Article 6(1)c of the Regulation*; Article 50 of the Education Law	throughout the term of the contract; in accordance with regulatory requirements	Ministry of Education (National Education Information System)
health data	legal obligation of RISEBA with regard to hazardous working conditions	Article 6(1)c of the Regulation*	10 years (according to Cabinet Regulations No. 219)	occupational doctor; after 10 years – State Archives
video surveillance	for the safety of RISEBA property and students	Article 6(1)f of the Regulation*	2 months	none
recording of lectures	applies only to academic personnel: for providing learning materials in an online environment	Article 6(1)b of the Regulation*	during the period of the respective study programme	Panopto – a platform that provides online instruction. Adequate level of protection provided.
work achievements and results	for evaluating reassignment and promotion of employees and their eligibility, KPI and performance management	Article 6(1)f of the Regulation*	throughout the term of the contract	none
awards, recognitions, evaluations	RISEBA corporate culture: for public announcement and / or	Article 6(1)f of the Regulation*	throughout the term of the contract	all RISEBA employees

	publication on public social networks and RISEBA websites and premises			
Photos, video recordings	RISEBA corporate culture: Photo and video created as the employee carries out work duties or participates in RISEBA events and which RISEBA uses for: - marketing activities and brand promotion - ensuring its basic operations - fostering corporate culture	Article 6(1)f of the Regulation*	indefinite	all RISEBA employees

*Article 6(1)a – the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

Article 6(1)b – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

Article 6(1)c – processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 6(1)f – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

3. Where we store employee data

RISEBA stores personal data in a database, in emails and/or on paper. RISEBA follows and implements the latest digitalisation trends and therefore processes personal data on paper only when this is the most convenient solution.

Personal data is stored on RISEBA local servers, and certain types of data (such as computer IP addresses) are stored through a cloud service. RISEBA only works with information technology service providers that ensure an adequate level of protection of personal data.

4. Duration of storage of personal data

Employee personal data is stored in accordance with regulatory requirements. RISEBA does not store employee personal data for longer than the legal term or when there is no other legal basis for further processing.

5. Access rights

Access rights to employee personal data are granted in accordance with the purpose for which the personal data is used.

6. Transfer of personal data to data controllers

RISEBA ensures that employee data is only transferred to data controllers that assist RISEBA in its operations and provide RISEBA with necessary services.

Such third parties may only process employee personal data in accordance with RISEBA's instructions under the agreement between the parties and may not use it for other purposes or transfer it to other persons without RISEBA's consent. RISEBA only cooperates with third parties that ensure the secure processing of personal data and data protection in accordance with the requirements of the applicable legislation.

Given the number of data controllers as well as their variable composition, RISEBA does not publish a list of such service providers, but employees have the right to request that RISEBA provide such information (see **10. Reviewing Questions, Applications and Complaints**).

7. How RISEBA protects personal data

RISEBA complies with all data protection-related regulatory requirements, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

RISEBA takes all necessary technical and organisational security measures to ensure that personal data is not accidentally or unlawfully destroyed, lost, damaged, modified, disclosed, or exposed to unauthorised third parties or any abuse in violation of data protection law.

8. Employee rights

The employee as data subject has the following rights:

- to access and obtain copies of his/her personal data processed by RISEBA;
- to request that RISEBA modify or correct his/her personal data in case it is erroneous or incomplete;
- to request that RISEBA delete his/her personal data or suspend its processing if the data is no longer needed for processing purposes;
- to object to further processing of data. When exercising the right to object to the processing, the controller shall not suspend the processing of the data if the processing is justified by the interests of RISEBA or other persons, which is more important than the rights and freedoms of the data subject. For example, when the number of data subjects in a photo exceeds 2 people, the interests and opinions of other data subjects will also be assessed. However, if the largest number of data subjects in the image objects to the data processing, the data processing will be suspended. RISEBA removes and does not continue the processing of the data subject's data only in cases when further data processing is associated with a negative impact on the data subject's reputation and honor;
- to withdraw consent to processing;
- to transfer data to another data controller;
- to lodge a complaint with the Data State Inspectorate if RISEBA is found to be in breach of data protection law

9. Employee responsibilities

Given that the protection of individuals with regard to the protection of personal data is a fundamental right, every employee, during and outside working hours, must comply with the requirements of the General Data Protection Regulation and other relevant laws and regulations governing the procedure in which personal data may be processed and what processing is prohibited. Therefore, please note that it is prohibited to film, photograph, or record other staff, students, guest lecturers and other RISEBA visitors, as well as to make such information publicly available and to publish any other personal data of such persons without their consent.

The requirements of the General Data Protection Regulation do not apply to the processing of personal data carried out by a natural person solely in the course of a personal or household activity.

10. Reviewing Questions, Applications and Complaints

RISEBA will, without undue delay and in any event within one month of receiving your request, inform you of any action taken upon your request in accordance with the law. That period may be extended by two additional months where necessary, taking into account the complexity and number of requests.

RISEBA will notify you of any such extension and the reasons for the delay within one month of receipt of the request. If you submit your request electronically, RISEBA will respond electronically unless you request otherwise.

In order to protect your privacy and security, we will take appropriate measures to verify your identity before disclosing any personal information you request.

To exercise these rights, please send an email to an employee at the applicable RISEBA department as well as the data protection specialist at: dpo@riseba.lv.

If you believe that RISEBA has violated your legal rights, you may lodge a complaint with the Data State Inspectorate, located at 14 Blaumaņa Street, Riga, tel.: 67223131, email: info@dvi.gov.lv.