

PERSONAL DATA PROCESSING PROVISION

Study Department

1. GENERAL INFORMATION

As part of the applicant admissions and study process, RISEBA collects and processes the personal data of data subjects – natural persons. Consequently, RISEBA is considered a data controller in accordance with the General Data Protection Regulation (“Regulation”) and is committed to ensuring a transparent process and complying with the relevant data protection obligations.

These provisions apply to and are binding on all departments of the Study Department.

As part of the Study process and in order to ensure the performance of its functions, the Study Department processes students’ personal data to the extent necessary and on the basis of the principles and legal grounds set out in the Regulation.

1.1. TYPES OF PERSONAL DATA

The Study Department processes the following personal data of applicants and students:

- Identifying information of students and applicants: first name, surname, personal identification number, date of birth, contact details (registered and actual residential address, email address and telephone number), details of or a copy of an identity document;
- Characteristics of students and applicants: nationality, language, gender, personal description, information on criminal convictions;
- Information regarding attendance: number of classes attended or absences;
- Information regarding applicants’ and students’ prior education and work experience;
- Information regarding applicants’ and students’ academic/study and financial obligations;
- Photographs and video recordings of applicants and students;
- Bank account details of the student or their parent;
- Information regarding the Student’s assessments;
- other personal data generated during the study process.

The Study Department processes the Student’s personal identification number and retains a copy of their identification document only when required by Latvian legislation to achieve specific objectives. Purpose of processing: to ensure compliance with the requirements set out in legislation.

A RISEBA employee ensures that consent is obtained from students who have reached the age of 18, and grants parents access rights to data processed by RISEBA.

The interests of a student who has not reached the age of 18 are represented by their parent. In the case of Admissions for international students – a RISEBA employee to whom such rights have been granted by a notarised power of attorney.

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2. ADMISSIONS OF APPLICANTS

During the applicant admissions process, RISEBA collects and processes personal data obtained from applicants' applications, data submitted for the conclusion of a study contract, and submitted CVs, certificates, diplomas and other similar sources.

A member of staff from the Study Department ensures that no excessive processing of personal data takes place during the Admissions process and therefore does not accept documents and data submitted by the applicant or their representative on their own initiative which are not necessary for the applicant's admission to RISEBA, taking into account the programme requirements and criteria of each individual study programme.

Applicant's documents are accepted using online solutions and the forms contained therein; the acceptance of applicant's documents using other solutions or email is not permitted.

2.1. IDENTIFICATION OF APPLICANTS AND CONCLUSION OF THE CONTRACT IN PERSON

Before concluding a study contract, a member of staff from the Study Department must verify the applicant's identity.

When signing the contract in person, the applicant is identified by being asked to present a valid form of identification.

The study contract is deemed to have been concluded when:

- the applicant has been identified; and
- the original signed Study Agreement has been received from the Applicant.

Once the study agreement has been signed, the applicant is granted access to RISEBA's study systems.

2.1. REMOTE IDENTIFICATION OF APPLICANTS AND CONCLUSION OF THE AGREEMENT

When signing the agreement remotely, applicant identification is carried out:

- online – using the identification tools available at RISEBA (Skype, Zoom, Unimetis, etc.); or
- by signing the contract electronically with a valid electronic signature.

When the applicant identification process takes place online, the applicant is identified by being asked to present a valid identity document. A member of staff from the Study Department records the completion of the applicant identification process for each applicant in the Applicant Identification Log.

The study contract is deemed to have been concluded when:

- the applicant has been identified and this is recorded in the relevant register; and
- the original signed Study Agreement has been received from the Applicant.

Upon conclusion of the study agreement and receipt of the signed original, the applicant is granted access rights to RISEBA's study systems.

If necessary, access rights to RISEBA's study systems are granted to the applicant upon receipt of an electronic copy of the signed Study Agreement. If the original signed Study Agreement is not received within two weeks, access rights to RISEBA's study systems must be suspended.

3. AUDITOR AGREEMENT

A member of staff from the Study Department must ensure that, prior to or at the time of signing the auditor agreement, the auditor is given the opportunity to familiarise themselves with the provisions governing the processing of their personal data, and that the auditor's consent is obtained for any form of data processing that requires the auditor's consent. The data processing documentation is drawn up by RISEBA's data protection specialist ("DAS").

In the event that current RISEBA students apply to sign an auditor agreement, such students are not required to sign the data processing provisions and/or consent to any form of data processing that requires the auditor's consent. In this specific case, the processing of auditors' data will take place in accordance with the Student Personal Data Processing Provision. This is justified by the identical purpose of personal data processing, as well as the fact that the processing will take place in accordance with the same data processing provisions.

5. RECORDING OF LECTURE ATTENDANCE

RISEBA academic staff members and invited guest lecturers keep records of student lecture attendance. This record-keeping is justified by the following:

1. Legal requirements regarding international students;
2. Requirements under the provisions of the study agreement;
3. Attendance records are taken into account when determining the student's mark/Assessment.

Type of personal data processed when recording attendance: the student's first name and surname.

Retention period for personal data: for the duration of the study contract, as well as for 1 year after the student's graduation.

Access rights: lecturer; Head of the Study Department, Programme director, Programme administrator; for international students – provision of information upon request from the External Relations Department.

6. PROCEDURE FOR PROVIDING INFORMATION AND ISSUING DOCUMENTS

6.1. ISSUANCE OF DOCUMENTS CERTIFYING EDUCATION

Documents certifying education are issued to students in accordance with the following procedure:

1. The original document is issued to the student full-time (in person); or
2. A copy of the document is issued electronically to the email address provided by the student; or
3. The original document is issued to a person authorised by the student, who represents the student based on a notarised power of attorney. A member of staff from the Study Department must ensure that the power of attorney submitted grants the authorised person the right to receive an educational document, and must retain the submitted power of attorney or a copy thereof.

Powers of attorney and copies thereof, as well as educational documents that have not been issued, shall be kept permanently, in accordance with the provisions of Cabinet Regulation No. 451 "Procedure for the Issuance of State-Recognised Documents Certifying Vocational Education and Professional Qualifications and Documents Certifying the Completion of Parts of Accredited Vocational Education Programmes".

6.2. ISSUING COPIES OF EDUCATIONAL DOCUMENTS TO ALUMNI

Upon receiving a request from a RISEBA alumnus to issue a copy of an educational document, a member of staff from the Study Department is obliged to verify the identity of the person submitting the request ("the Applicant"), in accordance with the following provisions:

- 1) Upon receiving an electronic request, compare the Applicant's email address with the email address listed in RISEBA's internal register(s). If the email address does not exist or does not match, ask the Applicant to submit the request from an email address known to and registered with RISEBA, or verify the Applicant's identity using the methods set out in the following points.
- 2) If the Requestor is located in Latvia, ask the Requestor to visit RISEBA and collect the documents in person or to submit a request signed with a secure electronic signature.
- 3) If the Applicant is located outside Latvia, ask the Applicant to submit a request signed with a secure electronic signature. If the Applicant is unable to do so, ask the Applicant to prepare a paper application, sign it and submit an electronic copy of it together with an electronic copy of an identity document.

If the Applicant is unable to meet RISEBA's requirements, the issuance of a copy of the educational document to the Applicant is prohibited.

7. RETENTION PERIODS FOR PERSONAL DATA

7.1. PERSONAL DATA OF APPLICANTS WITH WHOM NO STUDY AGREEMENT IS CONCLUDED

The personal data of applicants with whom RISEBA does not conclude a study contract, and which is stored in submitted documents and emails, is retained by the Study Department for 2 years; after this period, the data is deleted from emails and electronic folders, whilst paper documents are destroyed or returned to the data subject if the document has any value. This period is justified by the fact that there are cases where applicants who applied and submitted their data but did not conclude a study contract in due time reapply for studies and request that the submitted data and documents be reinstated.

7.2. ELECTRONIC CORRESPONDENCE WITH APPLICANTS, FORMER STUDENTS AND ALUMNI

RISEBA retains electronic correspondence with applicants, current students and alumni for a period of 2 years.

After this period, correspondence is deleted from email accounts, and printed copies of electronic correspondence are destroyed. This retention period is justified by the following circumstances:

1. Applicants who applied and submitted their details but did not sign a study contract in time, may reapply for studies and request that the data and documents they submitted be reinstated; these may be contained in the emails sent and facilitate and expedite the processing of their application whilst reducing the consumption of administrative resources.
2. The retained emails may contain information that is necessary in the event of complaints or disputes involving applicants or students.

7.3. STORAGE OF STUDY PAPERS, EXAMINATION PAPERS AND COURSE PAPERS

The Study Department prepares and transfers students' final theses to the archive and the Library immediately after their defence and the termination of the study contract with the student.

RISEBA does not retain students' written assignments and examination papers and returns them to the student immediately.

Final theses that have been awarded a mark of 8, 9 or 10 are prepared by a member of staff from the Study Department and submitted to the Library, where the student's final thesis is kept for one year and is available to the public for viewing by visitors to the RISEBA Library. After this period, the Study Papers are transferred to the RISEBA archive.

Final theses graded with marks lower than 8 are prepared by a member of the Study Department and transferred to the RISEBA archive immediately.

Total retention period for Study Papers: 5 years.

Upon expiry of the retention period, personal data is permanently deleted and destroyed.

The Study Department does not store Course papers and Internship reports, but retains them for the purpose of assessment of students' work. Retention is justified by the need to organise an effective Study process and communication with students.

Students' internship reports and course papers are stored at the Faculty department (with the Programme director) for 1 year and, upon expiry of the retention period, transferred to the RISEBA archive. Justification for the retention period: in the event of a student's complaint – to ensure that RISEBA is informed regarding the grounds and circumstances of the complaint. Upon expiry of the retention period, personal data is permanently deleted and destroyed.

7.4. RECORDS, REGISTERS

Registers of the issuance of vocational education documents, examination records, academic summary registers and other accounting documentation, as well as their electronic copies, are stored and processed in accordance with the time limits specified in the File Nomenclature and the requirements of regulatory enactments.

Retention period in addition to the provisions specified in regulatory acts:

Registration logs for the issuance of vocational education documents *in digital form*: stored indefinitely to ensure the transparency of the paper-based logs, facilitate work with them and reduce the consumption of administrative resources.

Appendices to educational documents in digital form: retained indefinitely to ensure the transparency of the paper-based registers, facilitate their use and reduce the consumption of administrative resources.

Examination records are compiled and retained throughout a student's studies, as well as for one year after graduation. During a student's studies, examination records are retained by the Lecturer and the Study Programme Administrators. After a student graduates, the Head of the Study Department retains summarised academic transcripts.

Reason for retention period: to provide evidence and supporting information in the event of student complaints.

Upon expiry of the provision for retention, the records are destroyed or transferred to the archive.

8. CUSTOMER SERVICE CENTRE (CSC)

8.1. PROCEDURE FOR ISSUING KEYS

As part of the CSC's operations, CSC staff issue keys to offices and lecture theatres located in RISEBA buildings (Meža iela 3, Meža iela 3, k.6 and Durbes iela 4), to RISEBA administrative and academic staff, including part-time faculty members, in accordance with the following provisions:

1. It is prohibited to issue keys to offices, lecture theatres and other premises to unauthorised persons.
2. Keys to an office shall only be issued to an employee of the relevant department in which that employee has a designated workstation.
3. Heads of departments are entitled to receive keys to all offices within their department.
4. Keys to offices and premises are also issued to other persons who require such keys to perform their duties (e.g. employees of a company providing cleaning services).
5. If a KAC employee is unable to verify the identity of the person requesting a key, or if there is any doubt regarding this, the KAC employee is obliged to request and the person is obliged to present a valid form of identification.
6. Each person must sign the logbook upon receiving and returning a key.

8.2. PROCEDURE FOR THE ISSUANCE AND STORAGE OF DOCUMENTS

The issuing and receipt of documents is carried out by a KAC employee, and the unauthorised receipt or removal of documents by other RISEBA employees is not permitted.

Outside KAC working hours, documents containing personal data of data subjects are stored in lockable cabinets, to which only KAC staff have access.

When receiving and storing documents containing personal data (e.g. contracts), ensure that the specially designed form is placed on top of the document.

Documents may be issued to:

- an employee whose right to receive the document arises from their direct job duties;
- to the person named as the recipient of the document;
- a person who holds a notarised power of attorney to receive documents on behalf of the addressee of the document. A KAC employee must ensure that the submitted power of attorney grants the authorised person the right to receive documents, and must retain the submitted power of attorney or a copy thereof.

Powers of attorney and copies thereof, as well as unissued educational documents certifying vocational education and professional qualifications, shall be kept permanently, in accordance with the provisions of Cabinet Regulation No. 451 "Procedure for the Issuance of State-Recognised Documents Certifying Vocational Education and Professional Qualifications

and documents certifying the completion of parts of accredited vocational education programmes".

If a KAC employee is unable to verify the identity of the person requesting the issuance of a document, or if there is any doubt regarding this, the KAC employee is obliged to request and the person is obliged to present a document proving their identity.

The issuing and collection of documents for students, applicants, staff, academic staff members, non-core faculty and other persons associated with RISEBA takes place only during the KAC's working hours.

The issuing and collection of attendance sheets outside KAC working hours is permitted only for groups of students whose studies take place exclusively on Sundays. Course registration sheets for students are issued and collected by a security guard.