

PERSONAL DATA PROCESSING PROVISION

External Relations Department

1. GENERAL INFORMATION

As part of the admissions and study process for international students (“Students”), 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.

2. COLLECTION OF PERSONAL DATA OF APPLICANTS AND STUDENTS

As part of the Study process and in order to fulfil its functions, the External Relations Department processes students’ personal data to the extent necessary and in accordance with the principles and legal bases set out in the Regulation.

2.1. TYPES OF PERSONAL DATA

The External Relations 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 the applicant’s and student’s previous education and work experience;
- Information regarding the applicant’s and student’s academic/study and financial obligations;
- Photographs and video recordings of the applicant and the student;
- The student’s or their parent’s bank account details;
- Information regarding the student’s assessments;
- Decisions of the Office of Citizenship and Migration Affairs;
- other personal data generated during the study process or the processing of which is based on the requirements of regulatory enactments.

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.

Document classification status: Information for internal use, 2020 edition No. 1

Approved by _____ Order No. _____: _____

An employee of the External Relations Department shall ensure that consent is obtained from students who have reached the age of 18, and shall grant parents access rights to data processed by RISEBA.

The interests of a student who has not reached the age of 18 shall be represented by their parent, who shall provide the staff member of the External Relations Department with a duly executed, notarised power of attorney to represent the student within the territory of Latvia.

2.2. Admissions for applicants

PREPARATION OF INVITATIONS AND VISAS

The External Relations Department arranges invitations for international applicants. To ensure the process runs more efficiently, information regarding the necessary visas and invitations is compiled and sent to companies or organisations that provide visa processing services. When commencing cooperation with new organisations, a member of staff from the External Relations Department must inform RISEBA's data protection Specialist, who is responsible for reviewing and preparing amendments to the Agreement containing provisions on the processing of personal data.

Call documentation is retained for 1 year and destroyed upon expiry of this period.

Reason for retention: to ensure the availability of documentation for the purposes of providing evidence, as well as in the event that the Student loses it.

COLLECTION OF APPLICANTS' PERSONAL DATA

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.

An employee of the External Relations 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.

IDENTIFICATION OF APPLICANTS AND CONCLUSION OF THE CONTRACT

Before concluding a study contract, a member of staff from the External Relations 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.

When signing the contract remotely, the applicant is identified using the identification tools available at RISEBA.

The study contract is deemed to have been concluded when:

- The applicant has been identified and this is reflected in the relevant records; and
- The original signed study contract has been received from the Applicant.

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

3. EXCHANGE PROGRAMMES

When implementing exchange programmes, RISEBA exchanges students' personal data with Latvian and foreign educational institutions, including those in the EU and third countries. The transfer of students' personal data takes place on the basis of an agreement concluded between the educational institutions or another document regarding the processing of personal data ("Agreement"). The transfer of students' personal data to an educational institution with which RISEBA has not agreed on the provisions for personal data processing is prohibited.

Before commencing cooperation with a new educational institution, a member of the External Relations Department must inform RISEBA's Data Protection Specialist ("DPO"), who is obliged to review and prepare amendments to the Agreement containing provisions on the processing of personal data.

The transfer of personal data to educational institutions in third countries takes place on the basis of Article 49(1)(b) and (c) of the Regulation.

When collecting students' personal data necessary for them to participate in exchange programmes, an employee of the External Relations Department collects only the minimum necessary data and does not collect or process personal data that is not required in accordance with the Exchange programme requirements.

The processing and transfer of students' personal data shall take place in accordance with the procedures set out in the Agreement, and the processing or transfer of personal data that alters or does not comply with the provisions set out in the Agreement is not permitted. In the event of any deviations, an employee of the External Relations Department is obliged to report this to the DPO.

4. STUDENT INTERNSHIPS

As part of the study process, students may apply for internships at EU institutions and organisations, for internship opportunities offered under the ERASMUS+ Programme, as well as for internships in countries outside the EU or the EEA (third countries).

As students choose their own internship locations and send their personal data directly to the chosen internships, RISEBA has no obligation regarding the transfer of such data. However, in an effort to protect the interests and rights of Students, a member of the External Relations Department must ensure that the internship agreement signed by the Student, RISEBA and the internship provider contains provisions regarding how the internship provider processes the Student's personal data.

1.1. [RISEBA Professional development activities and internships](#)

In implementing cooperation agreements with foreign higher education institutions, RISEBA ensures the organisation of professional development and internship activities. In accordance with the requirements of the Regulation, an employee of the External Relations Department must ensure that an agreement on the transfer of personal data is signed with foreign higher education institutions applying for such programmes, or that an appropriate Appendix is drawn up to an existing cooperation agreement.

Legal basis for the processing of personal data: Article 6(1)(b) of the Regulation.

Retention period for personal data: in accordance with the requirements of regulatory acts.

5. PROCEDURE FOR PROVIDING INFORMATION AND ISSUING DOCUMENTS

5.1. 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 shall be issued to a person authorised by the Student, who represents the Student on the basis of a notarised power of attorney. An employee of the External Relations 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 requirements of Cabinet Provision 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".

5.2. 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 External Relations 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 the one held by RISEBA, ask the Requester to submit the request from an email address known to and registered with RISEBA, or verify the Requester's identity using the methods set out in the following points.
- 2) If the Requester is located in Latvia, ask the Requester 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, as well as to send the original application by post.

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

6. RETENTION PERIODS FOR THE PERSONAL DATA OF APPLICANTS AND STUDENTS

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

The External Relations Department retains the personal data of applicants with whom RISEBA does not conclude a study contract, and which is stored in submitted documents and emails, 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 known 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 time reapply for studies and request that the submitted data and documents be reinstated.

In order to achieve the aforementioned objective, as well as to avoid additional costs for applicants, the External Relations Department retains applicants' educational equivalence documents for 5 years.

1.2. ELECTRONIC CORRESPONDENCE WITH APPLICANTS, FORMER STUDENTS AND ALUMNI

RISEBA retains electronic correspondence with applicants, former 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 the reinstatement of the submitted details and documents, which may be contained emails sent, which facilitate and expedite the processing of applications and reduce the consumption of administrative resources.
2. Saved emails may contain information that is necessary in the event of complaints or disputes involving applicants or students.

7. COOPERATION WITH FOREIGN AGENTS AND PARTICIPATION IN EXHIBITIONS

7.1. AGENTS

When using agents to recruit international students, staff in the External Relations Department must ensure that the Agent Agreement contains the personal data processing provisions drawn up by DPO or, where necessary, that a separate data processing agreement has been drawn up. The data processing agreement is concluded and signed at the same time as the Agent Agreement is signed.

If the Agent themselves proposes the personal data processing provisions or the data processing agreement for signing, these provisions and the agreement must be agreed with the DPO prior to signing.

If the type and/or scope of potential students' personal data changes between RISEBA and the engaged agent, the concluded agreements setting out the personal data processing procedures must be reviewed and submitted to the DPO for consideration.

The agent's personal data is stored and processed for the duration of the agent's contract and for 1 year after the contract's termination (purpose of storage: the possibility of renewing the terminated contract; complaints from the agent regarding the processing of personal data).

An employee of the External Relations Department must ensure that, in cases where the agent collects and sends the applicant's personal data to RISEBA themselves, such an application is accompanied by an electronic copy of RISEBA's provision for the processing of the applicant's personal data, signed by the applicant themselves.

7.2. PARTICIPATION IN EXHIBITIONS

As part of its activities, RISEBA organises and participates in education fairs and events held in Latvia and abroad.

As exhibition organisers collect and provide exhibition participants with the contact details of exhibition visitors, when participating in such an exhibition, an employee of the External Relations Department is obliged to coordinate with the DPO agreement, which is concluded between the exhibition organiser and RISEBA before signing the contract.

To collect the contact details of exhibition visitors for future communication purposes, staff of the External Relations Department use a specially designed form, which has been developed in accordance with the requirements of data protection legislation. These forms are retained for no longer than 3 years.

Legal basis for the processing of exhibition participants' personal data: consent.

When contacting exhibition participants, it is mandatory to refer to the interest they have expressed in communication, including a link to the RISEBA Privacy Policy, which sets out the provisions for the processing of personal data, and to provide the option to opt out of communication.