

Provision on the processing of personal data

Lifelong learning centre

1. GENERAL INFORMATION

As part of the Lifelong Learning Centre's activities, RISEBA collects and processes the personal data of data subjects – students. Consequently, RISEBA is considered a data controller in accordance with the General Data Protection Regulation ("Regulation"), and RISEBA is committed to ensuring a transparent personal data processing process and complying with the relevant data protection obligations.

2. ADULT EDUCATION PROJECT "EMPLOYED PERSONS "IMPROVING THE PROFESSIONAL COMPETENCE OF EMPLOYEES"

To implement the adult education project, RISEBA collaborates with the State Education Development Agency ("VIAA"). Following the launch of a new project cycle, VIAA sends RISEBA a draft training agreement. Before concluding a training agreement with learners, a staff member of the Lifelong Learning Centre must send the training agreement received from VIAA, as well as the Cooperation Agreement, to the Data Protection Specialist (dpo@riseba.lv) for updating RISEBA's personal data processing provisions.

During their first communication with a student, a staff member of the Lifelong Learning Centre shall provide the student with the personal data processing provisions, as well as the opportunity to sign to confirm they have read and understood them either at the same time as, or prior to, signing the study agreement.

The Lifelong Learning Centre processes learners' personal data in accordance with the provisions of the State Education Development Agency (VIAA), RISEBA guidelines and policies.

2.1. COLLECTION OF PERSONAL DATA

As applications for studies are made via the VIAA system, where various personal data of applicants is available, an employee of the Lifelong Learning Centre does not process personal data unnecessarily and collects only the data necessary for concluding a contract with the applicant, as well as data whose processing is required by law. The processing of personal data whose collection is not justified by any legal basis for the processing of personal data is not permitted.

Staff at the Centre for Lifelong Learning ensure that no unnecessary processing of personal data takes place during the Admissions process and therefore do not accept documents or data submitted by students on their own initiative which are not required for their admission to RISEBA, taking into account the programme requirements and criteria of each individual programme.

2.2. STUDENT IDENTIFICATION AND CONCLUSION OF THE CONTRACT

Before concluding a study contract in person, a member of staff at the Centre for Lifelong Learning must verify the student's identity. The student is identified by being asked to present a valid identity document.

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The Lifelong Learning Centre processes the learner's personal identification number and retains a copy of their identification document only when required by the regulatory acts of the Republic of Latvia to achieve the specified objectives. Purpose of processing: to ensure compliance with the requirements set out in regulatory acts.

3. STUDENT INTERNSHIPS

As part of the learning process, students may apply for internships at Latvian institutions and organisations.

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 students' interests and rights, a member of staff at the Centre for Lifelong Learning must ensure that the internship agreement signed by the student, RISEBA and the placement provider contains provisions regarding how the placement provider processes the student's personal data.

4. PROCEDURE FOR PROVIDING INFORMATION AND ISSUING DOCUMENTS

1.1. PROVISION OF INFORMATION TO THIRD PARTIES

An employee of the Lifelong Learning Centre shall ensure that a learner's personal data and information about them is not disclosed to other persons by telephone or email, except in cases where such disclosure is provided for by regulatory enactments.

When issuing documents and information, staff at the Lifelong Learning Centre shall verify the recipient's identity. The disclosure of documents and information to other persons is not permitted.

When providing references about a learner requested by Latvian institutions and organisations, the Lifelong Learning Centre staff member processing such requests and preparing responses must only disclose the requested information if the submitted request is justified in accordance with the requirements of Latvian legislation. In all other cases, the Lifelong Learning Centre employee must obtain the specific learner's consent. Furthermore, the requested information must be provided only if the submitted request is signed with an electronic signature or if another procedure stipulated by legislation has been followed. Otherwise, it is prohibited to disclose the learner's personal data.

Upon receiving a request by post, an employee of the Lifelong Learning Centre must, taking into account the likelihood, circumstances and available resources, as well as making reasonable efforts, ensure that such a request is:

- drawn up in accordance with the prescribed procedure – the request is submitted by a genuinely existing institution and is based on a specific regulatory act, the requirements of which can be verified, and
- signed – it is signed by an authorised signatory of the

institution. Otherwise, the disclosure of a student's personal data is prohibited.

Upon receiving a request that does not meet the aforementioned criteria and in response to it, an employee of the Lifelong Learning Centre must state the reasons why the disclosure of data is refused and must provide information on the required format of the request, which complies with this Procedure for the Provision of Information and the Issuance of Documents. This response must be agreed with RISEBA's data protection Specialist.

In any case, the Lifelong Learning Centre staff member is not limited to the aforementioned procedure, but shall use other options available to them, not mentioned in these procedures, to ensure that the request received is legitimate and that there is no risk to the student's rights and freedoms.

If the identity of the institution requesting the data cannot be verified or there are doubts regarding it, the Lifelong Learning Centre staff member must consult the RISEBA Data Protection Specialist (DPO) when considering the request and preparing a response.

In case of any doubt, the Lifelong Learning Centre staff member must contact the DPO (dpo@riseba.lv).

1.2. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

In accordance with the requirements of regulatory acts, as well as the principles and provisions set out in the Regulation, the Lifelong Learning Centre may transfer learners' personal data to the following recipients:

- state administrative institutions,
- educational support and administrative bodies,
- partner companies (internship providers),
- service providers who perform functions on behalf of the Lifelong Learning Centre.

When transferring learners' data to partner companies and service providers, a staff member of the Lifelong Learning Centre must ensure that a contract regarding the processing of personal data has been concluded with such parties. If no agreement has been concluded, the Lifelong Learning Centre employee must contact the DPO (dpo@riseba.lv).

1.3. 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 in person (full-time); 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 on the basis of a notarised power of attorney. An employee of the Lifelong Learning Centre must ensure that the power of attorney submitted grants the authorised person the right to receive a document certifying education, and must retain the submitted power of attorney or a copy thereof.

1.4. ISSUING COPIES OF EDUCATIONAL DOCUMENTS

Upon receiving a request from a student to issue a copy of a document certifying education, a staff member of the Lifelong Learning Centre is obliged to identify the person submitting the request ("the Requester"), 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 Applicant to submit

the request from an email address known to and registered with RISEBA, or verify the Requester's identity using the methods specified 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.

5. RETENTION PERIODS FOR STUDENTS' PERSONAL DATA

The Centre for Lifelong Learning stores and processes students' personal data in accordance with the time limits and procedures set out in regulatory enactments, as well as the RISEBA file classification system.

If no retention period for personal data is specified in a regulatory act or the File Classification System, then personal data must be retained for as long as is necessary to achieve the purpose of the processing. With regard to the processing of personal data to which the trainee has given consent, the Centre for Lifelong Learning shall process personal data until such consent is withdrawn or until the date specified in the consent form.

Powers of attorney and copies thereof, as well as unissued educational documents, are stored 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".

Upon expiry of the retention period, personal data must be irrevocably deleted and destroyed, except in cases where further retention is justified by the requirements of regulatory enactments.

Documents that must continue to be stored after the expiration of the personal data processing period in accordance with the requirements of regulatory enactments are stored and transferred to the archive by the Lifelong Learning Centre within 2 months after graduation.

If there are any doubts regarding the retention period and the legal basis, an employee of the Lifelong Learning Centre is obliged to contact the DPO (dpo@riseba.lv).

5.1. STUDENTS' PERSONAL DATA FOR WHOM NO CONTRACT IS CONCLUDED

The Lifelong Learning Centre deletes from emails and electronic folders the personal data of students with whom RISEBA has not concluded a contract and which is stored in submitted documents and emails, but paper documents are destroyed or returned to the data subject if the document has a known value, except in cases where further storage is justified by the requirements of regulatory acts.

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