

APPROVED
by the Senate of BA
School of Business and Finance
June 19, 2018, Minutes No.7

AMENDMENTS
by the Senate of BA
School of Business and Finance
December 18, 2018, Minutes No.12

Privacy Policy

Rīga

*In accordance with the Law on Higher Education
Institutions, section 15, part 1 and in compliance with the
Constitutional Assembly of BA School of Business and
Finance, section 21*

19 June 2018

No 1.5-2/24

I. General Provisions

1. Privacy Policy of the BA School of Business and Finance has been developed in accordance with the requirements for the processing and protection of personal data (hereinafter - data) at the BA School of Business and Finance (hereinafter - BASBF) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation) (hereinafter - the Data Regulation), as well as other regulatory enactments which regulate the processing and protection of data.

2. The purpose of the Privacy Policy is to provide an identified or identifiable natural person (hereinafter - the data subject) with information about the processing of data by BASBF.

II. Data Controller

3. Data controller is the BA School of Business and Finance (hereinafter - BASBF), registration No: 90000437699, registered office: Krišjāņa Valdemāra iela 161, Rīga, LV-1013, phone number: +371 67360133, email address: info@ba.lv.

4. BASBF is a higher education and scientific institution that implements

academic and professional study programs, as well as engages in science and research. BASBF operates in accordance with the regulatory enactments regulating higher education and scientific activities, the BASBF Constitution and other regulatory enactments.

5. BASBF is a derived public entity under the supervision of the Ministry of Education and Science.

III. Privacy Policy Enforcement

6. BASBF processes data that is any information relating to the data subjects referred to in Paragraph 8 of the Provisions, such as the name, identification number, location data, online identifier and data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data or data on a person's sexual life or sexual orientation.

(As amended by BA regulation No1.5-2 / 61 of 18.12.2018)

6.¹ BASBF follows the data processing principles set out in the Data Regulation when processing data.

(As amended by BA regulation No1.5-2 / 61 of 18.12.2018)

7. Data processing means any operation or set of operations on data or sets of data, carried out with or without automated means, such as collection, registration, organization, structuring, storage, adaptation or modification, retrieval, viewing, use, disclosure, transmission, distribution or otherwise making them available, harmonization or combination, restriction, deletion or destruction.

8. The privacy policy applies to the following BASBF data subjects:

- 8.1. academic personnel;
- 8.2. guest teachers;
- 8.3. general staff;
- 8.4. employees - trade union members;
- 8.5. former BASBF employees;
- 8.6. potential BASBF employees;
- 8.7. trainees;
- 8.8. family members of BASBF employees;
- 8.9. applicants;
- 8.10. students;
- 8.11. excluded students;
- 8.12. applicants for commencement of studies in later stages of studies;
- 8.13. applicants for recognition of study results achieved in previous education or professional experience;
- 8.14. audit students;
- 8.15. BASBF graduates;
- 8.16. participants of BASBF lifelong learning events;
- 8.17. BASBF debtors;
- 8.18. BASBF hotel customers;
- 8.19. BASBF library visitors;
- 8.20. members of the Convent of Advisers;
- 8.21. BASBF choir members;
- 8.22. board members of BASBF foundations;

- 8.23. students and graduates of other higher education institutions;
- 8.24. pupils, students and graduates of secondary education institutions;
- 8.25. relatives of the students;
- 8.26. friends of the students;
- 8.27. employees of the Agency of BASBF “BA Business College” (hereinafter - the College);
- 8.28. College applicants;
- 8.29. college pupils;
- 8.30. college students;
- 8.31. college graduates;
- 8.32. BASBF clients;
- 8.33. service providers;
- 8.34. members of professional associations;
- 8.35. employees and members of Latvian and foreign higher education institutions, as well as of academic and scientific institutions;
- 8.36. BASBF visitors;
- 8.37. BASBF website visitors;
- 8.38. BASBF mobile app visitors;
- 8.39. passers-by whose data are processed by video surveillance in the area adjacent to the buildings owned and used by BASBF in 161 Krišjāņa Valdemāra Street, Riga, and 43 Skanstes Street, Riga.

9. BASBF processes the data on the following legal basis:

- 9.1. the data subject has consented to the processing of his or her personal data for one or more specific data processing purposes;
- 9.2. processing is necessary for the performance of a contract to which the data subject is party or in order to take measures at the request of the data subject prior to the conclusion of the contract;
- 9.3. processing is necessary for compliance with a legal obligation to which the controller is subject;
- 9.4. processing is necessary to protect the vital interests of the data subject or of another natural person;
- 9.5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority legally conferred on the controller (for example: video surveillance);
- 9.6. processing is necessary in the legitimate interests of the controller or of a third party.

10. BASBF has the following legitimate interests:

- 10.1. ensuring and improving the quality of education provided by BASBF;
- 10.2. ensuring BASBF's visibility and branding;
- 10.3. ensuring and improving the quality of BASBF's research;
- 10.4. ensuring and building staff loyalty and respect for BASBF;
- 10.5. ensuring and improving BASBF's financial management;
- 10.6. ensuring and improving effective BASBF's governance;
- 10.7. providing and promoting a creative and positive environment at BASBF;
- 10.8. verification of the identity of the data subject before concluding the contract;
- 10.9. protection of university property, security of persons, recording of a criminal offense, identification of possible offenders.

(As amended by BA regulation No1.5-2 / 61 of 18.12.2018)

11. BASBF processes data in accordance with the realization of legal interests, fulfillment of obligations specified in regulatory enactments, fulfillment of obligations specified in contracts, provision of public information, as well as for other purposes provided for in advance.

12. BASBF processes the data in accordance with the requirements of confidentiality and ensuring the security of the data held by BASBF. BASBF uses various security measures to prevent unauthorized access to, disclosure of, or other inappropriate processing of data.

13. BASBF uses proportionate and appropriate physical, technical and administrative procedures and means to protect the data processed. The implemented security measures are improved in accordance with the security requirements specified in regulatory enactments.

14. BASBF employees who have access to the data are trained to handle them in accordance with the regulatory data security regulations.

15. BASB is entitled to transfer the data for processing without contacting the data subject, in the cases and in accordance with the procedures specified in regulatory enactments.

16. BASB has the right to transfer data to data controllers in the cases specified by law or in accordance with the agreements concluded with data processors by BASBF in order to ensure the public interests.

17. The data subject has the right to revoke the consent for the processing of his or her data, the legal basis of which is consent, at any time, if it is not in conflict with regulatory enactments. BASBF shall assess the request received in accordance with regulatory enactments. Withdrawal of consent shall not affect processing operations carried out while the data subject's consent was in force. Withdrawal of consent may not suspend the processing of data on other legal grounds.

17.¹ BASBF processes data on BASBF's Internet sites (hereinafter referred to as the website) with the consent of the data subject, using cookies, which are small text files that are sent to the data subject's computer or mobile device during a visit to the website and which the website stores on the data subject's computer or mobile device when the website is opened. The information related to cookies is not used by BASBF to identify the data subject.

17.² The purpose of the use of cookies on the website is to make the use of the website more convenient and secure, as well as, with the consent of the data subject, to analyze the habits and activities of the website visitors (connection time, duration, most viewed sections) in order to improve the quality of the website's content and tailor this content to the needs of its visitors.

17.³ BASBF uses cookies provided by Google Inc.'s Google Analytics on its website. The data subject has the right to refuse the use of Google Analytics cookies. The data subject can obtain information on cookies and how they can be managed or deleted on the following website: <http://www.whatarecookies.com/>.

(As amended by BA regulation No1.5-2 / 61 of 18.12.2018)

18. The data shall be kept by BASBF for as long as is necessary for the purposes for which they were obtained or for the periods specified by law. BASBF shall ensure that the data are deleted within the time limits and in accordance with the procedures laid down by law, if the data are no longer required for the purposes of processing specified above.