Personal Data Processing Policy at Estonian University of Life Sciences

The regulation is based on Regulation (EU) 2016/679 of the European Parliament and of the Council (directly applicable, entered into force in Member States on 25 May 2018) and Personal Data Protection Act (entered into force on 15 January 2019) and article 26.2.4 of the Statutes of Estonian University of Life Sciences.

1. General provisions

Estonian University of Life Sciences (hereinafter ‘the university’) shall follow the requirements and principles provided in this policy for the collection, processing and retention of personal data. The procedure establishes the policies, objectives and terms of personal data processing and rights related to personal data of data subjects. The procedure includes personal data processing by the university in all activities, incl. studies, academic research and support services via information systems and on the internet address www.emu.ee, ensuring the lawfulness and security of personal data processing.

2. Definitions for the purposes of this procedure

2.1. Personal data means any information concerning an identified or identifiable natural person (hereinafter ‘data subject’). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number,
location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2.2. Processing means any operation or set of operations, which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
2.3. Controller means the natural or legal person (incl. legal entity governed by public law) and other public authority that is the primary collector of personal data. The controller determines the objectives and means of processing;
2.4. Processor means the natural or legal person (incl. legal entity governed by public law) and other public authority, who is assigned and instructed by the controller to process personal data;
2.5. Third party means a natural or legal person (incl. legal entity governed by public law) and other public authority, agency or body;
2.6. Personal data breach means a breach leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
2.7. Data subject means the person whose personal data is processed.

3. Principles relating to processing of personal data
3.1. The university shall adhere to the following principles in processing personal data:
3.1.1. the principle of lawfulness, fairness and transparency – personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject;
3.1.2. the principle of purpose limitation – personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3.1.3. the principle of data minimisation – collection of personal data shall be limited to what is necessary in relation to the purposes for which they are processed;
3.1.4. the principle of accuracy – personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
3.1.5. the principle of storage limitation – personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

3.1.6. the principle of integrity and confidentiality – personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.2. The purpose of the processing

3.2.1. The purpose of the processing of personal data in studies is to organise studies regulated by the Republic of Estonia Education Act, Universities Act, Statutes of Estonian University of Life Sciences, study regulations and other rules governing teaching and learning at the university, and descriptions of support structure tasks.

3.2.2. The purpose of the processing of personal data in academic research is to organise research activities regulated by the Research and Development Organisation Act and other legislation regulating the field of research and development.

3.2.3. The purpose of the processing of personal data in the fields of administration and business operations is administration and business operations and personnel and financial activity regulated by Statutes of the university, descriptions of support structure tasks, accounting policies and procedures, standards of information technology, written business procedure rules, work arrangement rules, Employment Contracts Act, Law of Obligations Act, Accounting Act and other legislation regulating the field of accounting and other fields and executed contracts.

4. Rights of the data subject

4.1. Request that Estonian University of Life Sciences provide access to personal data related to him or her and request the amendment or deletion of such data;

4.2. File a complaint related to personal data processing to the Data Protection Inspectorate (website: www.aki.ee) if the person is of the view that personal data processing by the university breaches the rights of the data subject protected by law.

5. Confidentiality and security
5.1. The university applies various organisational, physical and information technology security measures for personal data protection following the principle of reasonableness.
5.2. If the university uses authorised processors for personal data processing, the university shall ensure that the authorised processors follow the university instructions and applicable law for personal data processing and that relevant security measures are applied.
5.3. Employees of the university must follow its written rules for business procedures, work management and the information technology standard of the university.

6. Storage and retention of data
6.1. Personal data shall be retained until the term specified in the list of university documents or the term specified by law from the creation of the document until the destruction or transfer to archives of the document.

7. Third parties and cross-border activities
7.1. The university shall not disclose personal data (including email address and telephone number) to third parties without the knowledge of the data subject. The university shall not transfer personal data outside of the European Economic Area without the knowledge of the data subject.
7.2. The university may share the data in its possession with third parties that verify the accuracy of data and are entitled by law to process data in the possession of the university.
7.3. The university shall share data with third parties only if there is a justifiable basis for doing so. Data is shared under a relevant data processing agreement whereby the third party is obligated to maintain the confidentiality of data received and apply security measures provided in the agreement to keep the data secure.

7. Contact details
The principles of data processing provided in this procedure shall be applicable to all structural units of Estonian University of Life Sciences (reg. No. 74001086, address Fr. R. Kreutzwaldi 1, Tartu 51006) and the web platform emu.ee. The email address of the university used for inquiries related to personal data processing and protection is andmekaitse@emu.ee and up-to-date contact details are listed at http://www.emu.ee/kontakt/.
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