

**PROCEDURE FOR PROCESSING PERSONAL DATA AT KAUNAS
UNIVERSITY OF APPLIED SCIENCES****CHAPTER I
GENERAL PROVISIONS**

1. The purpose of the *Procedure for Processing Personal Data at Kaunas University of Applied Sciences* (hereinafter referred as the Procedure) is to regulate the processing of personal data at Kaunas University of Applied Sciences (hereinafter referred as KUAS), ensuring the compliance with and the implementation of the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter – the GDPR), Law of the Republic of Lithuania on Legal Protection of Personal Data (hereinafter – the LLPPD), the Labour Code of the Republic of Lithuania and other legal acts regulating the protection of personal data.

2. This Procedure sets out the purposes and principles of data processing, the rights of data subjects and the procedure for their implementation, the rights and obligations of KUAS staff when processing personal data, organizational and technical data protection measures and other issues related to personal data processing.

3. The provisions of the Procedure shall be binding on all KUAS employees whose functions are related to the processing of personal data and other persons who, in the course of their duties and / or providing their services to KUAS, become aware of personal data and under the agreement with KUAS undertake to protect them.

4. KUAS processes personal data of all members of KUAS community – current and former employees, students, unclassified students and other persons who have submitted information on the basis of contractual and other legal relations in accordance with the procedure established by law.

5. KUAS is the controller of all data collected in the activities and internal administration processes of KUAS, as well as the processor of personal data transferred by data subjects and third parties.

6. KUAS employees while performing their duties and processing personal data, shall comply with the basic principles of personal data processing and the requirements of confidentiality and security set out in the GDPR, LLPPD and this Procedure.

7. Key concepts:

7.1. **Personal data** means any information related to a natural person – data subject (e.g., student, unclassified student, employee) whose identity is or can be identified directly or indirectly by using such data as name, surname, personal identification number, location data, an online identifier, one or several physical, psychological, economic, cultural or social characteristics of a person.

7.2. **Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

7.3. **Data Protection Officer** is an employee designated by KUAS to perform the duties assigned to the Data Protection Officer by the GDPR and LLPPD in relation to the data controlled and / or processed at KUAS.

7.4. **Data recipient** means a natural or legal person, to whom personal data are disclosed.

7.5. **Data subject** means a natural person whose personal data are processed by data controllers or processors.

7.5¹. **Data security breach** means a breach of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Sub-paragraph 7.5¹ added by order no. 1-156 as of 29 April, 2020

7.6. **Consent of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

7.7. **Disclosure of data** means disclosure of personal data by transfer or other means of making them available (with the exception of publishing them in mass media).

7.8. **Data processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

7.9. **Data 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.

7.10. **Data processing by automatic means** – any operation performed with personal data carried out in whole or in part by automatic means.

7.11. **Data processing by non-automatic means** – any operation performed with personal data carried out by non-automatic means (processing personalised systematic files – lists, files, compilations and other documents).

7.12. **Data processing for statistical purposes** means conducting statistical surveys, providing and storing their results.

7.13. **Data controller** means a legal or a natural person, public authority, agency or other body which alone or jointly with others determines the purposes and means of processing personal data.

7.14. **Supervisory authority** means an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR. In Lithuania it is the State Data Protection Inspectorate.

7.15. **Special categories of personal data** mean data concerning racial or ethnic origin of a natural person, his political opinions or religious, philosophical or other beliefs, membership in trade unions, as well as genetic data, biometric data, health data, data on a person's sexual life and sexual orientation.

7.16. **Internal administration** means activity which ensures an independent functioning of the data controller (structure administration, personnel management, management and use of available material and financial resources, and document management).

7.17. **Video surveillance** means processing of image data concerning a natural person (hereinafter – video data) by using automated video surveillance means (video and photo cameras, etc.) irrespective of whether these data are recorded in a file or not.

8. Other concepts used in the Procedure shall have the same meaning as in the GDPR and the Law on Electronic Communications of the Republic of Lithuania.

CHAPTER II GENERAL PRINCIPLES AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

9. KUAS staff and / or authorized persons when performing their duties and processing personal data, shall comply with the following **general principles of personal data protection**:

9.1. personal data shall be collected and processed accurately, fairly and only for the legitimate purposes defined in this Procedure;

9.2. the personal data of data subjects are stored in personal files and in the relevant databases managed by KUAS and service providers. Personal data must be accurate and, where necessary for the processing of personal data, kept up to date: the accuracy, timeliness and completeness of the data are of paramount importance and shall be assessed according to the purposes for which they are processed. The employee authorized by the head of the structural units / divisions where personal data are processed is responsible for updating personal data. Inaccurate or incomplete data shall be rectified, supplemented, destroyed or suspended;

9.3. personal data is collected at KUAS only in accordance with the procedure established by legal acts. Such data may be collected directly from the data subject, by formally requesting the entities that process and have the right to provide the required information, or by accessing databases, registers and information systems that collect individual data on the basis of agreements and legislation. In some cases, personal data are processed by KUAS with the consent of the data subject.

9.4. personal data shall be identical, relevant and not excessive in relation to the collection and further processing of such data. The amount of processed personal data shall not exceed the amount necessary to achieve the purposes of personal data processing set out in this Procedure.

9.5. personal data shall be stored for no longer than is necessary for the purposes of the processing. Personal data shall be stored for as long as the laws or other legal acts require the storage of documents or media containing personal data. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which they were processed.

10. The above-mentioned principles shall also be followed when preparing documents, i.e., it is necessary to avoid the use of excessive data on natural persons, their private or family life, unless it is required by the factual circumstances or the legal grounds.

11. Personal data shall be processed at KUAS only on legal grounds in accordance with the GDPR, laws of the Republic of Lithuania, internal regulations, as well as when the data subject has submitted (given) consent or information on personal data processed at KUAS is publicly available in accordance to the established procedure.

12. The processing of personal data is considered lawful if these **conditions for the processing of personal data** are followed:

12.1. the data subject has provided a consent to the processing of his or her personal data for one or more specific purposes. The data of a data subject, such as photographs, the use of his / her image in advertising, information leaflets, etc., are only possible with the explicit consent of the data subject. The consent is also required when providing information about persons who will participate or have participated in KUAS events, in order to process special categories of (special) personal data, etc.

12.2. the processing is necessary for the execution of the agreement where the data subject is a party of or for taking actions at the request of the data subject prior to the conclusion of the agreement, i.e., where the processing involves current employment and / or staff selection, application for a job, studies at the KUAS;

12.3. the processing of data is necessary in order to fulfil the legal obligation of KUAS to provide data and information about the data subject to public authorities;

12.4. the processing is necessary to protect the vital interests of the data subject or of another natural person;

12.5. the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data subject;

12.6. the processing is necessary for the legitimate interests of KUAS or the third party to whom the personal data are provided, in order to ensure the protection of KUAS and its assets, the security of technological processes, the safety and health of employees, internal administration, etc. For this purpose, video surveillance and security systems, IT surveillance, detection of intoxication

and other means may be installed to ensure the achievement of the above-mentioned purposes (unless the interests of the data subject or his / her fundamental rights and freedoms outweigh the stated purposes of the processing, i.e., the right to privacy, hygiene, recreation, etc.).

CHAPTER III DATA PROTECTION OFFICER

13. The Data Protection Officer is responsible for the data processing activities performed at KUAS according to his / her competence. KUAS, as the data controller, ensures that the Data Protection Officer shall not receive any instructions regarding the performance of the personal data processing tasks assigned to him / her, and shall not assign tasks and responsibilities that may give rise to a conflict of interest.

14. The Data Protection Officer shall:

14.1. prepare documents and procedures in accordance with the requirements set by the GDPR;

14.2. control how KUAS employees and other processors of personal data at KUAS perform personal data processing duties set forth in this Procedure and process personal data;

14.3. publicly announce the data processing actions performed by the data controller in accordance with the established procedure;

14.4. provide suggestions and conclusions to KUAS management regarding the establishment of data protection and data processing measures, as well as supervise the implementation and use of these measures;

14.5. provide direct instructions to employees to eliminate violations of personal data processing;

14.6. acquaint employees authorized to process personal data with the provisions of legal acts regulating the protection of personal data;

14.7. initiate and organize impact assessments on the processing of personal data;

14.8. assist data subjects in exercising their rights;

14.9. give advice to personal data processors on personal data processing and protection issues;

14.10. be responsible for creating the register of data processing operations;

14.11. decide on the need for an impact assessment of data protection and, if necessary, carry it out. If necessary, the Data Protection officer shall address the State Data Protection Inspectorate for preliminary consultations;

14.12. in the event of a personal data incident, take possible measures to recover the lost personal data and / or reduce the damage caused to the personal data by the incident;

14.13. in specified cases, notify the data subject and the State Data Protection Inspectorate of the occurrence of the personal data incident;

14.14. ensure secrecy or confidentiality related to the performance of his / her tasks in compliance with the requirements established by the legal acts of the European Union and the Republic of Lithuania;

14.15. perform a risk assessment of personal data processing at least once in 2 (two) years, prepare a report and, if necessary, take measures to eliminate or reduce the risk;

14.16. inform the State Data Protection Inspectorate in writing if it determined that personal data are processed in violation of the provisions of legal acts regulating data protection or by refusing to perform direct instructions to eliminate such violations;

14.17. performs other tasks and responsibilities assigned by legal acts.

CHAPTER IV PURPOSES OF PERSONAL DATA PROCESSING

15. Personal data is processed at KUAS for the following purposes:

15.1. *For the purpose of study administration* (formalization of admission of students to KUAS, conclusion of study agreements, organization and implementation of studies, issuance of graduation documents, execution of financial settlements) the following data are processed – name (s), surname, personal identification number, identity document (type), place of residence and contact details in Lithuania – street, house number, flat number, settlement (post office), city / municipality, country, telephone number, email address, signature; additional data of exchange students (citizenship, entry visa validity dates, level of the English language proficiency (certificates), information on arrival / departure); work experience, social status (inclusion to a group of socially disadvantaged persons), military service, data on education (code, name, and type of finished secondary education, year of graduation, country), data on studies (mode of study, faculty, study programme, course, semester, group, student status (student, unclassified student), type of funding, size of the ‘student’s basket’ and year, student identity card number, completed study courses, duration of studies, data on interruption of studies, form of assessments, date, assessments of study achievements, place of internship, time and feedback on completed internship, time and place of mobility abroad under Erasmus + and other international exchange programmes and data on arrival / departure (copies of tickets), other diploma data, documents of final thesis, the value of the text-matching of the final thesis, identification numbers given to the student, bank account number, payments and / or benefits made, their amount and dates, type of documents issued to the Student, series, number, validity (issue) date, data on health – fact of illness.

Sub-paragraph 15.1 replaced by order no. 1-156 as of 29 April, 2020

15.2. *For the purpose of the administration of accommodation services in KUAS dormitories* – name (s), surname, personal identification number, date of birth, gender, place of residence and contact details – street, house number, flat number, settlement (post office), city / municipality, country, telephone number, email address; signature, citizenship, social status, study programme (for students), mode of study (for students), year of studies (for students), student status (for students), dates of the beginning and end of the reservation.

Sub-paragraph 15.2 replaced by order no. 1-156 as of 29 April, 2020

15.3. *For the purpose of administration of the scientific process* (to determine the authorship of scientific products, record and evaluate the results of science (and art) -related activities of employees and students, carry out graduation procedures at KUAS, complete and submit documents) the following data are processed: name (s), surname, personal identification code, personal telephone number (s), personal email address, place of work, date of birth, signature, institution of work or studies), department of the institution (work or studies), type of studies (for students), academic group (for students), date of commencement of studies (graduation date (for students), position, degree (for staff), date of commencement of final or research paper, date of completion and / or defence, language of final or research paper, topic / title of final or research work, topic / title of final or research paper in English, the summary of the final or research paper in Lithuanian and English, the responsibilities of the participants in the defence process and the identification data, online access status of the thesis or research paper, the deadline for publication, the date of publication, the indication of the completion of the text-matching of the final or scientific paper, the significance of the text-matching of the final or scientific paper, the identity of the person who performed the text-matching, the final or research paper documents.

Sub-paragraph 15.3 replaced by order no. 1-156 as of 29 April, 2020

15.4. *For the purpose of internal administration* (structure administration, information management of current and former employees, document management, management of available material and financial resources) the following data are processed: name (s), surname, citizenship, address, personal identification number, date of birth, gender, photo, signature, marital status, signature, number and dates of birth of the dependents, amounts of salary and social security contributions, dates of state insurance, data on participation in pension accumulation system, current account number, telephone number, email address, curriculum vitae, position, data on employment (transfer), dismissal, work experience, position to which the person wishes to be appointed or transferred, employee tabular identification number, data on education and qualifications, pedagogical titles, identification code in the register of teachers, data entry (change)

date, data on holiday, data on business trips, traineeships, data on individual work schedules, on remote work, working mode arrangements, data on remuneration, benefits, compensation, allowances, information on working hours, information on incentives and penalties, breaches of official or job responsibilities, data on performance appraisal of employees, data on declarations of public and private interests, special categories of data related to a person's health, passport and / or identity card number, date of validity, former place of employment and position, former surname, systematic lists of provided means, equipment and tools issued, validity dates of driving license, validity dates of civil liability (vehicle) insurance, other personal data provided by the person himself / herself.

Sub-paragraph 15.4 replaced by order no. 1-156 as of 29 April, 2020

15.5. *For the purpose of ensuring security of library visitors and property* – name (s), surname, personal identification number, email address, telephone number; student identity card number, faculty, year of studies, study programme;

Sub-paragraph 15.5 replaced by order no. 1-156 as of 29 April, 2020

15.6. The following data are processed *for the purpose of authentication of information systems*: name, surname, personal telephone numbers, personal email address, given user name, password reminder data.

Sub-paragraph 15.6 replaced by order no. 1-156 as of 29 April, 2020

15.7. The following personal data are processed *for the administration of the user account and for the purpose of identification*: name, surname, student certificate number (for students), position (for employees), email address, institution (for work or studies).

Sub-paragraph 15.7 replaced by order no. 1-156 as of 29 April, 2020

15.8. The following data are processed *for the purpose of organizing conferences and other events*: name (s), surname, signature, personal telephone number (s), current account number (for natural persons – payers), personal email address, place of work, date of birth, institution (work or studies), units / divisions of the institution (work or studies), position, degree, email address, language of writing the research paper, summary of the final or research paper in Lithuanian and English, online access status of the research paper, term of restriction, date of publication, data used to identify a person.

Sub-paragraph 15.8 replaced by order no. 1-156 as of 29 April, 2020

15.9. The following data are processed *for the purpose of financial settlements and debt collection*: name (s), surname, personal identification number, telephone number, current account number (for natural persons – beneficiaries), address of residence, email address.

Sub-paragraph 15.9 replaced by order no. 1-156 as of 29 April, 2020

15.10. The following data shall be processed *for the administrative purpose of candidates applying for the position or performing work-related functions*: name (s), surname, curriculum vitae and data included data – photo, personal telephone number (s), email address, current and former place of employment, date of birth, institution of study (current or former), position, degree and other personal data voluntarily provided by the candidate.

Sub-paragraph 15.10 replaced by order no. 1-156 as of 29 April, 2020

15.11. The following data are processed *for the purpose of handling complaints, requests and statements of individuals and internal administration* (document management): name (s), surname, personal identification code (optional), address, telephone number, email address, signature, date of complaint, request or statement and number (date and number of registration in KUAS document management system), information included in the complaint, request or statement (including specific personal data), result of the complaint, request or statement, information received during the complaint, request or statement, date and number of requests or statements.

15.12. The following data are processed *for the purpose of public order and access control* (ensuring the security of staff, students and other persons visiting KUAS, as well as KUAS property): name (s), surname, signature, videos and photographs from the security cameras. Video surveillance is carried out at KUAS in order to ensure the safety of persons, property and visitors and public order in the premises and territory of KUAS. Information is also collected for the investigation of related incidents. Security cameras are used for taking videos in KUAS outdoor

territory, entrances to the KUAS buildings, areas of general use, network or engineering system equipment concentration points (server rooms, communication points, building management system control panels, laboratories, etc.).

Sub-paragraph 15.12 replaced by order no. 1-156 as of 29 April, 2020

15.13. The following data are processed *for the purpose of communication with employees and / or students / unclassified students, alumni*: name, surname, telephone number, email address of the employee and / or student / unclassified student, alumni and designated contact person in case of emergency.

Sub-paragraph 15.13 replaced by order no. 1-156 as of 29 April, 2020

15.14. The following data are processed *for the purpose of communication with the community and (or) the public*: name, surname, telephone number, email address of the contact person, represented company, position.

Sub-paragraph 15.14 replaced by order no. 1-156 as of 29 April, 2020

15.15. *For the purpose of implementation of agreemental relations with legal and / or natural persons*, the following data are processed: name, surname, position, telephone number, email address, signature of the persons representing, contacting and performing the agreement.

Sub-paragraph 15.15 replaced by order no. 1-156 as of 29 April, 2020

15.16. The following data are processed *for the purpose of social network administration*: sent messages (in favourite posts, posts shared by the person, commented posts), marked events, personal messages sent to KUAS via its account, comments below KUAS posts, reactions to KUAS posts, photos of events, certificates in KUAS posts, certificates for the participation in KUAS events and KUAS posts shared by persons.

Sub-paragraph 15.16 replaced by order no. 1-156 as of 29 April, 2020

15.17. *For the purpose of informing about the studies carried out at KUAS and / or scientific and artistic and project-related activities*, the following data are processed: photo (s) and / or video (s), name, surname, group (for students), workplace (for third parties), position (for KUAS staff / third parties).

Sub-paragraph 15.17 added by order no. 1-157 as of 30 April, 2020

15.18. *For public health purpose*, the following data are processed: name, telephone number, fact of participation in a contact session (specific place, date and time) (for students), specific place of work or studies, fact of health status with COVID-19 symptoms, mandatory self-isolation and the fact of its duration, audio (voice) recording of the calls (if the recording is performed when it is not possible to answer the phone), the fact of participation in the event (meeting, etc.) organized by KUAS, place, date and time, confirmation about meeting the criteria, listed in the Resolution of the Government of the Republic of Lithuania of 26 February 2020 No. 152 “On the Announcement of the State Emergency”, which allows a person to use the means of unrestricted or unrestricted conditions of part-time work, study activities and implementation of measures for the prevention and control of COVID-19 (coronavirus infection).

Sub-paragraph 15.18 added replaced by order no. 1-397 as of 22 October, 2020

Sub-paragraph 15.18 added replaced by order no. 1-302 as of 03 September, 2021

CHAPTER V PERSONAL DATA PROCESSING

16. Personal data at KUAS shall be processed by automatic means or in systematic sets, using personal data processing means implemented at KUAS.

17. Personal data shall be collected by KUAS in accordance with the procedure established by legal acts, receiving them directly from the data subject by formally requesting the necessary information from the entities having the right to disclose it or on the grounds of relevant agreements. Data from social profiles or similar sources are not collected or processed.

18. KUAS, in compliance with the requirements established in the Procedure and the GDPR, shall inform data subjects about the processing of personal data (Annex 1).

19. In some cases, personal data are processed at KUAS with the consent of the data

subject (for example, by disclosing the necessary information in the event of an accident or similar occurrences, as well as special categories of data using the data subject's image in advertising, informational leaflets (Annex 2), etc.).

20. The following information shall be provided for the direct collection of personal data from the data subject (except in cases when the data subject already has such information):

20.1. data controller's address, telephone number, email address;

20.2. the purposes for which the personal data of the data subject are intended to be processed;

20.3. what personal data of the data subject are required;

20.4. what are the consequences of not disclosing personal data;

20.5. to whom and for what purposes his / her personal data will be disclosed;

20.6. the data subject's right of get acquainted with his / her personal data and the right to request the rectification of incorrect, incomplete or inaccurate personal data.

21. Before concluding an employment agreement, a person may submit a request or an agreement on the scope of processing of his / her personal data. Such a request or agreement may be acceptable only to the extent that the information provided is sufficient to ensure a normal employment relationship, warning the employee that the consequences of the non-disclosure of data at his / her request or agreement fall on the data subject himself / herself (for example, non-payment of social benefits, insurance services, provision of unfair working conditions, etc.).

22. Candidates applying for a job at KUAS may submit documents with their personal data directly to the Human Resources Service, send by regular mail or email. The legal basis for data processing is the data subject's consent to the processing of his / her personal data, expressed in the job application documents, and the legitimate interest of the employer in selecting the most suitable employee.

23. Persons who have disclosed information about themselves for the purpose of employment at KUAS (e.g., submission of a CV) are informed that their personal data may be processed for the purpose of administering candidates and, if the person agrees that his / her data will be stored and processed for the specified purpose, their submitted data shall be processed in accordance with this Procedure.

24. The data of persons applying for a job shall be stored in the Human Resources Service for 3 months from the date of their receipt. If, at the end of the selection for a certain position, KUAS does not select a candidate and does not conclude an employment agreement with the candidate, all personal data collected for the purpose of selection shall be securely destroyed, unless the consent for candidate data processing has been obtained.

25. KUAS does not process or record additional personal data provided by candidates about themselves, and these data are not related to the selection.

26. KUAS shall not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, as well as genetic and biometric data in order to specifically identify a natural person, health data or data on a person's sexual life and sexual orientation. This restriction does not apply when one of the following conditions is met:

26.1. The data subject has expressly consented to the processing of such personal data for one or more of the specified purposes, except where the processing of such data is mandatory by law or regulation;

26.2. when there is an alternative means of providing personal data;

26.3. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of KUAS or of the data subject in the field of employment and social security and social protection in so far as it is authorised by law or a collective agreement providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

26.4. processing relates to personal data which are manifestly made public by the data subject;

26.5. processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health

or social care or treatment or the management of health or social care systems and services on the basis of the agreement with a healthcare institution.

26.6. processing is necessary for archiving purposes, scientific research or statistical purposes, as well as in other cases provided by the GDPR or the laws of the Republic of Lithuania.

27. Where personal data concerning the data subject have been obtained indirectly from the data subject or with the intention of providing personal data to third parties, the data subject shall be informed at the latest by the time the data are first provided, unless the data subject already has such information or the transfer of data is established by other legislation. The following information shall be provided to the data subject:

- 27.1. KUAS and data recipient's address, telephone number, email address;
- 27.2. the purposes for which the personal data of the data subject are processed or intended to be processed;
- 27.3. from what sources and what personal data of the data subject are collected or intended to be collect;
- 27.4. to whom and for what purposes the personal data of the data subject are disclosed;
- 27.5. the data subject's right of access to his / her personal data and the right to request to rectify incorrect, incomplete, inaccurate personal data.

28. Information shall be provided directly to the data subject in writing, by registered mail or by electronic means of communication, by which it is possible to identify the data subject and obtain an acknowledgment of receipt of the information, ensuring proof of access.

29. The data subject has the right, in the cases provided for in the GDPR, to object to the processing of his / her data by a third party, informing the Data Protection Officer of his / her decision.

30. When it is not possible to provide the data subject with information due to the large number of data subjects, outdated character of the data, excessively large expenses, the data subject shall be notified about that thereof.

31. In cases and in accordance with the procedure established by legal acts, KUAS shall provide personal data of the data subject including, but not limited to the Ministry of Education, Science and Sports of the Republic of Lithuania, the Ombudsman of Academic Ethics and Procedures of the Republic of Lithuania, the State Tax Inspectorate of the Republic of Lithuania, the State Security Department of the Republic of Lithuania, the Board of the State Social Insurance Fund, the National Cyber Security Centre of the Republic of Lithuania, the Communications Regulatory Authority of the Republic of Lithuania and other third parties upon request (in case of single personal data collection) or under personal data disclosure agreement (in case of multiple personal data collection).

Sub-paragraph 31 replaced by order no. I-157 as of 30 April, 2020

32. Personal data shall be provided to data recipients in the Member States of the European Union and other countries of the European Economic Area under the same conditions and in accordance with the same procedure as to data recipients located in the Republic of Lithuania.

33. Personal data which are processed or which are intended to be processed following a transfer to a third country or to an international organization shall be transferred only if the controller and the processor comply with the provisions of the GDPR.

34. When KUAS concludes a written data disclosure agreement with the data controller, it shall:

- 34.1. state the purpose of the use of personal data and the legal basis for its provision and receipt;
- 34.2. establish that the data processor may act only on behalf of the data controller's instruction;
- 34.3. specify the legal acts and standards regulating the processing of personal data;
- 34.4. establish the purposes and methods of processing personal data;
- 34.5. provide a list of processed personal data;

34.6. specify which personal data processing operations shall and may be performed by the data processor on behalf of the data controller;

34.7. indicate how and in what cases personal data will be revised, rectified, when they will be updated, how altered personal data will be processed, etc.;

34.8. describe the procedure for exercising the rights of the data subject;

34.9. foresee the deadline for the storage of personal data (including the active and / or passive database) and the actions to be taken after this deadline;

34.10. set out the requirement for the compliance with confidentiality;

34.11. describe the application of organizational and technical measures for the protection of personal data;

34.12. establish liability for non-compliance with the terms and conditions of the agreement.

35. The data processor shall ensure the implementation of appropriate organizational and technical measures to protect personal data against accidental or unlawful destruction, alteration, disclosure, as well as against any other unlawful processing.

36. The personal data protection measures of the data processor shall comply with the requirements established in KUAS security documents.

37. KUAS, in accordance with the provisions of the GDPR, may process personal data collected for the purpose of archiving in the public interest, for the purpose of scientific or historical research or for statistical purposes.

38. The duration for the storage of personal data and the actions to be taken after the expiry of this term shall be established by legal acts regulating the processing of personal data. Personal data shall be kept for no longer than is necessary for the purposes of the processing. Specific terms for the storage of personal data (documents containing personal data) are set out in KUAS Documentation Plan. Personal data processed by automatic means shall be stored within the terms laid down in the internal KUAS legislation. When personal data are no longer needed for the purposes of their processing, they are destroyed, except for those that must be transferred to the new archives of the State of Lithuania in cases established by law. Persons designated by order of the Director shall be responsible for the destruction of the data.

Sub-paragraph 38 replaced by order no. 1-156 as of 29 April, 2020

39. KUAS units / divisions, in accordance with the requirements of KUAS legal acts, shall destroy unnecessary data (documents containing personal data or copies thereof) collected manually in such a way that the information contained therein is not recognizable, and delete unnecessary personal data files collected by automatic means from the data storage medium so that they cannot be reproduced.

CHAPTER VI RIGHTS OF THE DATA SUBJECT

40. The data subject shall have the right:

40.1. to know (be informed) about the processing of his / her personal data;

40.2. to have an access to his personal data and to be informed of how they are processed;

40.3. to request rectification of his / her personal data or taking into account the purposes of the processing of personal data, to supplement incomplete personal data (right to rectification);

40.4. to destroy his / her data or suspend the processing of their data processing, except for storage (right to destroy and right to be forgotten);

40.5. to request the data controller to restrict the processing of personal data (right to restrict);

40.6. to request to the transfer of his / her personal data when such transfer is reasonable and technically possible when the transfer of personal data processed by KUAS by automatic means is requested (right to transfer);

40.7. to object against the processing of specific optional personal data if the objection of the data subject is legally justified;

41. The data controller may not provide conditions to data subjects to exercise these rights when, in cases established by law, it is necessary to ensure the prevention, investigation and detection of criminal offenses, violations of official or professional ethics, as well as protection of data subject's or other persons' rights and freedoms.

42. In all matters related to the processing of data of data subjects and the rights of data subjects provided for in the GDPR, LLPPD and other related legal acts, data subjects have the right to apply directly to the heads of structural units / divisions of KUAS and / or the Data Protection Officer.

43. The data subject has the right to get acquainted with the sources and what personal data were collected, for what purpose they are processed, to which data recipients they are disclosed and have been disclosed during the last year.

Sub-paragraph 43 replaced by order no. 1-156 as of 29 April, 2020

44. The data subject shall have the right to request KUAS to immediately delete his / her personal data if this can be justified by one of the following reasons:

44.1. personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

44.2. the data subject withdraws the consent on which the processing is based in accordance with Article 6 (1) (a) or Article 9 (2) (a) of the GDPR and there is no other legal basis for data processing;

44.3. the data subject objects to the data processing in accordance with Article 21 (1) of the GDPR and there are no overriding legitimate reasons to process the data or the data subject objects to the data processing in accordance with Article 21 (2);

44.4. personal data have been processed illegally;

44.5. personal data shall be deleted in accordance with a legal obligation laid down in European Union or Member State law applicable to the controller;

44.6. personal data have been collected in the context of the offer of information society services referred to in Article 8 (1) of the GDPR.

45. KUAS shall provide the data subject with the data requested free of charge once in a calendar year. In other cases, the data shall be provided in accordance with the service fees approved by the order of the Director.

46. Where the data subject, after familiarising with his or her personal data processed at KUAS, finds that his or her personal data are incorrect, incomplete or inaccurate, he / she addresses KUAS for data rectification, the Data Protection Officer shall suspend the processing of such personal data, except storage, and no later than within 5 working days after checking the personal data, take measures to correct incorrect, incomplete, inaccurate personal data and provide the person with a response informing about the actions taken.

47. Where the data subject, after familiarising with his or her personal data processed by KUAS, finds that his / her personal data is processed unlawfully and unfairly and applies to KUAS, the Data Protection Officer shall verify the accuracy and lawfulness of personal data processing within 5 working days and take measures to destroy the personal data collected unlawfully and unfairly or suspend processing of such personal data, except storage, without delay, as well as inform the data subject of the actions taken.

48. If the data subject, having received the reply and acquainted with his / her personal data processed by KUAS, finds that further processing of his / her personal data is inappropriate and withdraws his / her prior consent to the processing and requests KUAS to forget it, the Data Protection Officer shall take measures, to destroy personal data processed on the basis of consent, except storage, and to inform the data subject of the actions taken or to inform him or her why the data cannot be destroyed.

49. Where the personal data of a data subject have been made public by KUAS but required to be deleted by the data subject, the Data Protection Officer, taking into account technologies used by KUAS and the amount of the implementation costs, shall take reasonable actions, including technical measures, to ensure that such personal data and / or their copies or

duplicates are destroyed immediately.

50. The requirements to forget and delete personal data shall not apply if the reasons listed in sub-paragraphs of this paragraph 44 cannot be justified and in the cases provided for in Article 17 (3) of the GDPR, including when:

50.1. KUAS has legal obligations to process the data or to carry out the task carried out in the public interest;

50.2. for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes in accordance with the GDPR and other requirements established by law;

50.3. in other cases, provided for in the GDPR and other legal acts.

51. KUAS, having suspended the processing of the personal data at the request of the data subject, shall store the personal data whose processing operations have been suspended until they are rectified or destroyed (at the request of the data subject or after the expiry of the data storage term).

52. The data subject has the right to submit a complaint to the State Data Protection Inspectorate regarding KUAS actions (inaction).

53. The data subject has the right to demand compensation for pecuniary and non-pecuniary damage caused to him / her by KUAS due to illegal processing of personal data (inaction).

54. The data subject shall submit a written request or complaint addressed to the Data Protection Officer at KUAS on all issues related to the processing of his / her personal data and the exercise of his / her rights (Annex 3).

55. Current and former KUAS employees, other data subjects shall submit requests or complaints directly to KUAS Legal and Documentation Management Service, as well as by registered mail or electronic means of communication that allow proper identification of a person (for example, by a qualified electronic signature).

56. Current and former KUAS students and / or unclassified students shall submit requests or complaints to KUAS academic unit / division processing the data of the data subject, as well as by registered mail or electronic means of communication that allow proper identification of a person.

57. The request shall be legible, signed, it shall contain the name, surname, address and other contact details of the data subject in the desired form of communication, information on which of the data subject's rights and to what extent are desired to be exercised.

58. The data subject may exercise his / her rights only after providing KUAS the opportunity to verify his / her identity. The identity of the data subject shall be verified in one of the following ways:

58.1. upon arrival at KUAS and together with the request to exercise the rights by presenting an identity document;

58.2. in accordance with the procedure established by legal acts or by electronic means of communication which allow proper identification of a person (for example, by a qualified electronic signature). When submitting a request or complaint at KUAS units / divisions, the data subject shall show the identity document to the employee receiving the documents.

59. The employee receiving the request or complaint shall verify the identity of the person.

60. When sending a request by registered mail, the data subject shall also submit a copy of the identity document certified by a notary, in an equivalent or simplified procedure, as provided for in the Civil Code of the Republic of Lithuania and other legal acts. The envelope shall have the notice that the correspondence is addressed to the Data Protection Officer of KUAS.

61. The data subject may exercise his / her rights himself / herself or through a notarized representative.

62. If a personal representative applies on behalf of the represented data subject, in his / her request he / she shall indicate his / her name, surname, place of residence, contact details, as well as the name, surname, place of residence of the represented person, information on which of

the data subject's rights provided for in the Procedure and to what extent are desired to be exercised, and to attach a document certifying representation or a copy of its document, approved in accordance with the procedure established by legal acts. The request submitted by the representative shall meet the same requirements as the requested submitted by the represented person.

63. In case of doubt as to the identity of the data subject, the data controller shall request the additional information necessary to ascertain it.

64. All requests and complaints of data subjects regarding personal data processing issues and responses thereto shall be registered in KUAS Document Management System.

65. A request or complaint of a data subject submitted in violation of the requirements set out in this Procedure shall not be handled, unless the Data Protection Officer decides otherwise. The Data Protection Officer shall inform the person submitting the request or complaint in writing of the reasons for the refusal.

66. Requests and complaints of individuals shall be answered in the state language and in the manner in which the request or complaint was submitted, unless the person wishes to receive a response in another way.

67. If necessary, a request or complaint may be answered in a non-official language when the request is submitted by a foreign state institution, another foreign entity or international organization in accordance with international law.

68. The Data Protection Officer or another person authorized by KUAS Director shall coordinate the preparation of the response to the request or complaint, consult KUAS units / divisions and provide the response to the data subject.

69. The response to the data subject shall be signed by the Data Protection Officer or another person authorized by KUAS Director.

70. Responses to the request shall be prepared taking into account its content:

70.1. request for the issue of a document, a copy or an extract thereof shall be answered by the provision of the requested service or the reasons for refusal shall be indicated;

70.2. the complaint shall be answered by informing about the investigated circumstances or stating the reasons for refusal;

70.3. the request to provide the information available at KUAS shall be answered by submitting the requested information in accordance with the procedure established by the Law on the right of the Republic of Lithuania to receive information from state or municipal institutions and bodies or the reasons for refusal;

70.4. the request setting out a person's attitude on a particular issue, reporting on deficiencies in KUAS activities or its units / divisions and making suggestions on how to rectify them, drawing attention to a specific situation, informing about employee abuse or acting unlawfully outside the legitimate interests and rights of a particular person violation, or any other request from a person is answered in a free-form letter.

71. The request or complaint shall be answered in a clear and reasoned manner, indicating all the circumstances that influenced the examination of the request or complaint and the specific legal provisions on which the assessment of the content of the request or complaint was based.

72. The reply, stating the reasons for the refusal to provide the requested service, shall inform the person or his representative of the procedure for appealing against such a reply by indicating the name (s) of the authority or authorities to which the complaint may be addressed; the address (es) as well as the deadline (s) within which the complaint may be lodged. When forwarding a request or complaint to another competent authority and informing the person or his or her representative thereof, it is not necessary for the person to be notified of the said appeal procedure in the notification.

73. Information on personal data processing issues not included in the information systems managed by KUAS shall be collected by KUAS units / divisions processing the data subject's data and submitted to the Data Protection Officer not later than within 14 (fourteen) calendar days from the data subject's request.

74. A response to a data subject's request or complaint concerning the processing of his or her personal data shall be provided free of charge within 30 calendar days from the date of the request, except in the cases and conditions provided for in the GDPR and other legislation, including Article 12 (3) depending on the complexity of the request and the number of other requests, that period may be extended by 2 months.

75. The staff member handling the request or complaint shall withdraw from the handling of the request himself or herself or may be removed by the decision of the Director or his / her authorized person if the data subject submits a request or complaint related to the activity of KUAS employee processing personal data or the following circumstances arise:

75.1. the employee is a close relative (as defined in the Civil Code of the Republic of Lithuania), brother/sister-in-law or cohabitant of the person for whom the investigation of the complaint has been initiated;

75.2. there is a relationship of subordination between the employee and the person making the request or complaint;

75.3. the impartiality of the employee is reasonably questioned for any other reason that could cause a conflict of public and private interests.

76. Copies of personal documents received with the request or complaint of the data subject shall be destroyed within 6 (six) months from the end of the handling the complaint. Complaints, requests and documents of their examination shall be stored for 1 (one) year and destroyed after the expiration of the established storage term in accordance with the procedure established by legal acts.

77. Documents containing personal data or copies of those documents on external data media or email shall be deleted immediately after their use and / or transfer to storage places, but not later than within 5 (five) working days after request or complaint.

78. Documents containing personal data or copies of such documents shall be destroyed in such a way that their content cannot be reproduced and identified.

79. While handling the requests and complaints, KUAS staff shall follow the principles of respect for human rights, justice, fairness and reasonableness.

80. KUAS may provide processed personal data to third parties only in cases and in accordance with the procedure established by laws and other legal acts. The written request of third parties shall specify the purpose of the use of personal data, the legal basis for the provision and receipt and the scope of the personal data requested.

81. Requests to provide information about KUAS students / unclassified students submitted by telephone, electronic or otherwise in the form of non-statutory third parties (e.g., requests from parents of students regarding the learning outcomes of their children) shall be answered by the notice that information is not provided. (Annex 4).

82. KUAS shall ensure that the rights of the data subject are properly exercised and that all information is provided to the data subject in a clear, comprehensible and acceptable form.

CHAPTER VII SECURITY MEASURES

83. In order to ensure the protection of personal data, KUAS shall implement appropriate organizational, technical and software protection measures to protect personal data from accidental or unlawful destruction, alteration, disclosure, as well as from any other unlawful processing.

84. KUAS employees shall have the right to collect, process, transmit, store, destroy or otherwise use personal data only in the performance of their direct functions as defined in the Staff Regulations or on behalf of the Director and only in accordance with legal acts. Employees are prohibited from arbitrarily collecting, processing, transmitting, storing, destroying or otherwise using personal data.

85. Access rights to personal data and powers to process personal data shall be granted,

destroyed and changed by an order of KUAS Director.

86. KUAS employees shall sign a commitment to follow the principle of confidentiality and to preserve the confidentiality of any information relating to personal data which they have obtained in the course of their duties, except where such information is public in accordance with applicable laws or regulations. The principle of confidentiality also means that those who process personal data are prohibited from disclosing them, unless the personal data subject gives his or her consent, the data subject has made the data public, and in cases required by law to prevent or investigate criminal or illegal activities, if personal data are needed for court proceedings.

87. The Head of the Human Resources Service at KUAS shall ensure that employees sign a commitment to the protection of personal data (hereinafter - the Commitment) (Annex 5). This Commitment is valid upon termination of employment or agreemental relationship, transfer to another position. The Commitment signed by each employee is stored together with his employment agreement.

88. Personal data (documents containing personal data or copies thereof) shall be stored in dedicated premises, locked cabinets or safes, areas of the local network, and computer hard drives. Personal data (documents containing personal data or copies thereof) shall not be kept in a visible place accessible to all, where unauthorized persons have unhindered access to them.

89. When exchanging personal data (documents containing personal data or copies thereof) or their powers, personal data (documents containing personal data or copies thereof) shall be transferred to newly hired employees and persons appointed to process personal data by the act of transfer-acceptance.

90. Employees may access only those documents and data files to which they have been authorized to access, make them available only to authorized persons, and use these documents and files in the performance of their direct duties and only when necessary for the purposes set out in this Procedure.

91. Employees shall prevent the accidental or unlawful destruction, alteration, disclosure, as well as any other unlawful processing of personal data, store documents properly and securely, keep these documents in a place visible to all, and avoid making unnecessary copies.

92. If an employee or other person have doubts regarding the reliability of the implemented security measures, he / she shall contact the head of the unit / division or the Data Protection Officer in writing, who shall assess the available security measures and, if necessary, initiate the acquisition and implementation of additional measures, upon whose request the responsible staff member of IT Division shall evaluate the available security measures and, if necessary, initiate the acquisition and implementation of additional measures.

93. KUAS shall ensure the proper implementation and maintenance of technical equipment, compliance with fire safety rules, proper network management, maintenance of information systems and the implementation of other technical measures necessary to ensure the protection of personal data.

94. Automatic processing of personal data at KUAS is performed at the second level of security – organizational and technical measures for personal data security are ensured by KUAS and data processors who automatically process personal data accessed through external data transmission networks.

95. The following hardware and software security measures shall be implemented at KUAS, including but not limited to:

95.1. KUAS desktop and laptop computers, which may store personal data and / or confidential information, shall be password-protected, consisting of at least 8 characters consisting of uppercase and lowercase letters, numbers, and special characters (!, @, #, \$, %, ^, & etc). For example: L^ba\$1du.3 (such a password shall not be used);

95.2. the password shall be changed at least every 60 calendar days;

95.3. computer screensavers shall be activated automatically for more than 5 minutes user inactivity and require a password in order to return to work on the computer;

95.4. Laptop hard drives (HDD, SSD) and external storage media (USB memory sticks,

external HDD and SSD) that can store personal data and / or confidential information shall be encrypted using a 'bitlocker' program that is supported by Windows Vista and later versions of Microsoft operating system;

95.5. Office (smart – with Android or MAC operating systems) mobile phones and tablets shall have the ESET Endpoint security for business antivirus software installed. The employee shall contact the IT Division for its installation and activation. Also, the screen authentication of official mobile devices shall be protected by a PIN code (the graphic template is not suitable) and, if the technical capabilities of the device allow, fingerprint scanning is enabled to unlock the device;

95.6. employees who work with personal data and use go.kauko.lt account provided by KUAS on mobile phones or tablets are also subject to the requirement specified in Paragraph 95.5;

95.7. files containing personal data and / or confidential information shall not be sent by email to other KUAS employees, but shall be shared with employees authorized to process personal data using Google Drive tools;

95.8. data stored on computer (potential personal data, desktop, documents, and other relevant directories) shall be synchronized with Google Drive or alternative cloud technology to prevent data loss;

95.9. KUAS website www.kaunokolegija.lt shall be limited to the maximum extent possible for public Internet search engines and search engine robots to copy the information from the website and the possibility for these systems and robots to find copies of previously published but already removed information from KUAS website shall be limited. Computer equipment shall be protected from malicious software (installation, updating of antivirus programs, etc.);

95.10. access to personal data shall be controlled by means of organizational and technical measures for the security of personal data which record and control registration and right acquisition efforts;

95.11. the number of allowed wrong log in attempts to the information system is determined;

95.12. the following records of log ins to personal data are recorded: author of the log in, date, time, duration, result of the log in (successful, unsuccessful). These records shall be kept for at least 1 year;

95.13. the request for the search of the personal data provided shall specify the purpose (s) of the use of the personal data;

95.14. the use of secure passwords when personal data is transmitted via external data transmission networks is ensured;

95.15. the security control and deletion of personal data contained in external data media and electronic mail after their use is ensured;

95.16. When working remotely or conducting study sessions, the wireless network (Wi-fi) used in the workplace of the employee and / or student shall be password protected (cannot be open to everyone).

Sub-paragraph 95.16 added by order no. 1-156 as of 29 April, 2020

96. For assistance in implementing these measures, employees shall contact IT engineer of their Unit / Division or staff of IT Division, as well as by email itpagalba@go.kauko.lt

Sub-paragraph 96 replaced by order no. 1-156 as of 29 April, 2020

97. For the installation of ESET Endpoint security for business antivirus software for mobile devices (Paragraph 95.5), employees of the departments shall contact the IT Division.

98. At least once a month, the designated employee or other responsible person shall make copies of the data file on the computers. If these files are lost or damaged, the employee shall contact the IT Division. The responsible employee of the IT Division shall restore them within two working days.

Sub-paragraph 98 replaced by order no. 1-156 as of 29 April, 2020

CHAPTER VIII PROCEDURE FOR MANAGING PERSONAL DATA BREACHES

99. Employees who have the right of access to data shall inform their immediate supervisor and the Data Protection Officer if they notice any data security breaches (omissions or actions that may cause or pose a threat to data security).

100. After assessing the risk factors of the data protection breach, the degree of impact of the breach, the damage and the consequences, in accordance with the *Procedure for Responding to Personal Data Security Violations* (Annex 6), the responsible employees shall decide on the measures necessary to eliminate the data breach.

CHAPTER IX FINAL PROVISIONS

101. This Procedure sets out, including, but not limited to, the personal data security measures that shall be taken when processing personal data. KUAS may take additional safeguards to ensure a higher level of data protection.

102. The main technical and organizational measures for the processing of personal data and the implementation of the rights of the data subject, using the information systems and databases operating at KUAS, shall be established by the regulations of these systems, data security regulations and other legal acts.

103. The heads of the structural units / divisions are responsible for the protection of personal data and the lawful processing of personal data in the structural units / divisions.

104. The Procedure shall be introduced to newly hired employees and signed by them by the responsible staff member of the Human Resources Service. The heads of structural units / divisions shall ensure that all employees subordinate to them constantly take interest in and acquaint with amendments and supplements to this Procedure.

105. Employees who do not comply with the provisions of the Procedure shall be liable in accordance with the procedure established by the laws of the Republic of Lithuania if the State Data Protection Inspectorate establishes violations of GDPR, LLPPD and (or) other legal acts regulating the protection of personal data.

106. Failure to comply with the provisions of this Procedure, taking into account the seriousness of the breach, may be considered a violation of employment duties, for which the employees may be subject to liability provided for in the Labour Code of the Republic of Lithuania.

107. The Data Protection Officer shall audit the organizational and technical security measures of personal data processing at least once in 2 (two) years.

108. The Procedure shall be reviewed and updated at least once every 2 years or in the event of changes in the legislation governing the processing of personal data.

109. The Procedure may be supplemented, amended or deleted by an order of KUAS Director.

110. KUAS Labour Council has been informed about this Procedure and has been consulted on the adoption of this Procedure.

111. The Procedure shall enter into force on the day following its official publication in KUAS document catalogue at <https://dok.kauko.lt/>.

112. The following annexes are also an integral part of the Procedure:

112.1. Information form on the processing of personal data (Annex 1).

112.2. Consent to the use of the image and the processing of personal data (Annex 2).

112.3. Request form for exercising the data subject's right (s) (Annex 3).

112.4. Model response form to requests from third parties to provide them with information about KUAS students (Annex 4).

112.5. Form of the confidentiality commitment of personal data (Annex 5).

112.6. Procedure for responding to personal data security breaches (Annex 6);

112.7. Personal data security breach report form (Annex 7);

112.8. Personal data security breach log (Annex 8).

INFORMATION ON THE PROCESSING OF PERSONAL DATA

By signing this document, I confirm that I am informed that Kaunas University of Applied Sciences (hereinafter - KUAS), legal entity code 111965284, Pramonės ave. 20, 50468 Kaunas, tel. (+370 37) 35 23 24 acts as a data controller in the processing of my personal data. KUAS processes my personal data for the following purposes and/or conditions: to comply with my request and/or to perform the agreement (or to take action at my request before the conclusion of the agreement) to which I am a party, and/or fulfils a legal obligation imposed on it by law.

I am informed that I have the following data subject rights: the right of access to my personal data and how they are processed; the right to request the rectification or supplementing of incomplete personal data, the right to request the destruction or to suspend the processing of personal data (except for storage); the right to request that the processing of personal data be restricted; the right to data transfer; the right to submit a complaint to the State Data Protection Inspectorate; the right to withdraw consent. I understand that my rights can only be exercised after I have been identified and after a case-by-case assessment of the validity of my request.

I am familiar with Procedure for Processing Personal Data at Kaunas University of Applied Sciences and I am aware that the Procedure for exercising the rights of the data subjects and other requirements for the processing and protection of personal data are set out in this Procedure.

I am informed that KUAS may provide my personal data to or from the controllers of information systems and registers to the extent necessary to fulfil my request, perform the functions assigned to KUAS or perform the agreement concluded with me. Data can be provided or obtained from the following information systems and registers: Student Register; Register of Pedagogues; Disability and Working Capacity Service under the Information System of the Ministry of Social Security and Labor (DWCS IS); Educational and Scientific Institutions Register; The National Education Management Information System (NEMIS); The Electronic Declaration System of the State Tax Inspectorate; Information system of the State Social Insurance Fund Board under the Ministry of Social Security and Labour, the Information system of the State Labour Inspectorate under the Ministry of Social Security and Labor. KUAS may also provide and receive my personal data to other state or municipal institutions or bodies, including, but not limited to, the Ministry of Education and Science of the Republic of Lithuania, the Ombudsperson of Academic Ethics and Procedures, the State Tax Inspectorate of the Republic of Lithuania, the Special Investigation Service of the Republic of Lithuania, the Special Investigation Service, the State Security Department of the Republic of Lithuania, The State Social Insurance Fund Board, National Cyber Security Centre at the Ministry of National Defence, the Communications Regulatory Authority of the Republic of Lithuania, courts, service providers upon request or under a personal data provision agreement..

I am informed that the consequences of the above non-submission data, i. y. the loss of certain rights to the benefits/guarantees provided for in the Labor Code, is my own (for example, non-payment of social benefits, provision of appropriate working conditions, etc.).

The term of retention of personal data is as set out in the General Document Retention Terms Index, KUAS Documentation Plan and other legal acts.

(signature)

(name, surname)

CONSENT TO THE USE OF IMAGE AND PROCESSING OF PERSONAL DATA

_____ 20 _____

Kaunas

I, _____
(name, surname, group (for students only), workplace (for third parties only), position (for employees and third parties only))

by signing this consent, confirm that I am informed that Kaunas University of Applied Sciences (hereinafter – KUAS), legal entity code 111965284, Pramonės ave. 20, 50468 Kaunas, tel. (8 37) 35 23 24 acts as the Controller in the processing of my personal data.

I consent _____ / I do not consent _____, that KUAS, while implementing its functions established by the Law on Science and Studies of the Republic of Lithuania and complying with the requirements of the EU General Data Protection Regulation and other national legal acts, would take photographs and / or video and use my captured image for informative purpose regarding KUAS studies and / or scientific, artistic and project activities in regular KUAS communication channels (website (<https://www.kaunokolegija.lt/>), intranet (<https://intranet.kauko.lt/>), social network accounts on *Facebook*, *Instagram*, information leaflets, articles, stands, etc. and process the following personal data of me: photo (s) and / or video (s) with my image, name, surname, position.

I consent _____ / I do not consent _____, that, my personal data – photo (s) and / or video (s), name, surname, group (for students), workplace (for third parties), position (for KUAS employees, third parties) – would be used for the above-mentioned purpose on KUAS website (<https://www.kaunokolegija.lt/>), on KUAS social network accounts on *Facebook*, *Instagram*, information leaflets, articles, stands, etc.

I am informed that:

- I have the right to withdraw my consent at any time (such withdrawal does not affect the lawfulness of the processing carried out before the withdrawal of consent);
- KUAS will not pass my personal data on to third parties, except when articles, video reports, photos are shared via *Facebook*, *Instagram*, intranet and / or when they can be found via the google.com search engine (in which case the data recipients are *Facebook*, Inc. (USA), *Google* LLC (USA));
- my consent to the processing of personal data and other personal data I have provided, i.e., photo (s), video (s) with my image, name, surname, position are stored for the entire term of the employment contract and 2 years after the termination of the employment contract or withdrawal of the consent (in the case of the student's consent – the study agreement), except in cases where the processing of data is necessary for the public interest for archiving, scientific or historical research purposes.

(signature)

(name, surname)

Request Form for Exercising the Data Subject's Right (s)

(Data Subject's name, surname¹)

(Address and / or other contact details (telephone number or email address (to be provided at the request of the applicant))

(Representative and grounds for representation if the request is made by the representative of the data subject)²

(Name of the Data Controller)

REQUEST TO EXERCISE THE RIGHT (S) OF THE DATA SUBJECT

(Date)

(Place)

1. I hereby request to exercise the following right (s) of the Data Subject:
(Check the box where appropriate):

The right to be informed about data processing

The right of access to data

The right to request rectification of data

The right to request erasure of data ('right to be forgotten')

The right to restrict data processing

The right to data portability

The right to object to data processing

The right to request not to be subject to a decision based solely on automated processing, including profiling

2. Indicate what you are specifically requesting and provide as much information as possible to enable your right (s) to be properly exercised (*for example, if you wish to receive a copy of your personal data, please specify the copy of what data (for example a copy of the email of x x x day x x x month of 2018, video of x x x day x x x month of 2018 (x h x min – x h x min) you wish to receive; if you want to rectify data, indicate which specific personal data is inaccurate; if you do not consent to the processing of your personal data, then indicate the arguments for your objection, indicate which specific data processing you do not consent to; if you are applying for the exercise of the right to data portability, please indicate in respect of which data you wish to exercise this right, whether you wish to transfer it to your device or to another data controller, if the latter, then indicate which one)*):

¹ Additional data may be requested in order to determine whether the Data Subject's data are being processed, such as the code assigned to the Data Subject by the Controller, etc.

² If the request is made by the representative of the Data Subject, a document certifying the authority of the representative shall be attached.

(Sample response to third party requests
to provide them with information about KUAS students)

To: (addressee)

date

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 on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and the Law on Legal Protection of Personal Data of the Republic of Lithuania prohibit the disclosure of the personal data of the current or former students/unclassified students of KUAS.

To comply with legal requirements, we are unable to provide the information you have requested. Please be informed that we are ready to provide current/former/unclassified students with all the information about their studies at KUAS without any intermediaries or an authorised person.

Sincerely,
Position

signature

name, surname

CONFIDENTIALITY COMMITMENT OF PERSONAL DATA PROTECTION

(date)

I, _____
(name, surname, position)

confirm that I am familiar with the Regulation (EU) 2016/679 of the European Parliament and of the Council as of 27 April, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), the Law on Legal Protection of Personal Data of the Republic of Lithuania, the Procedure for Processing Personal Data at KUAS and I **promise**:

1. To protect the confidentiality of personal data throughout the employment (contractual relationship) and after the termination of the employment (contractual) relationship, if these personal data are not intended for public disclosure.

2. To process personal data only for lawful purposes.

3. To process accurate personal data and, if necessary, to update, rectify or supplement inaccurate or incomplete data and / or to suspend the processing of such personal data.

4. To process personal data only to the extent necessary for their processing and performed function (including non-retention of copies of processed data, unless required by applicable law).

5. The processing of personal data shall be carried out in such a way that the data subjects can be identified for no longer than is necessary for the purposes for which they were processed and subsequently destroyed.

6. Not to disclose, transfer processed information and (or) passwords that allow access to personal data by software, not to create conditions for access to personal data by various means by any person who is not authorized to use them both at KUAS and outside.

7. To ensure the exercise of the rights of the data subject in accordance with the procedure established by legal acts.

8. Immediately inform the immediate superior or Head of the Unit / Division of any attempts by persons not entitled to access personal data to obtain the information entrusted to me.

9. Immediately notify the Data Protection Officer at KUAS and the immediate superior of any data breach (any breach that results in the unintentional or unlawful destruction, loss, alteration, unauthorized disclosure, transfer, storage or other processing of personal data or access to them).

10. Comply with the provisions of other legal acts regulating the processing and protection of personal data.

I am informed:

- that I will be liable for non-compliance with this commitment and violation of the General Data Protection Regulation and the Law on Legal Protection of Personal Data of the Republic of Lithuania in accordance with the applicable laws of the Republic of Lithuania;

- that a person who has suffered damage as a result of unlawful processing of personal data or other actions or inactions of KUAS as the Data Controller has the right to claim compensation for pecuniary or non-pecuniary damage caused to him / her;

- that KUAS, having compensated the damage caused to a person by the unlawful processing of personal data, has the right to claim the losses incurred from the employee processing personal data, due to whose fault such damage has occurred, in accordance with the procedure established by law.

(position of the person)

(signature)

(name and surname)

The commitment was signed in the presence of*:

(position of the Head of the Unit / Division)

(signature)

(name and surname)

* Not to be filled in when signing by electronic means ensuring non-repudiation.