Annex 3: Instruction on Processing of Personal Data by Palacký University Olomouc as a controller of personal data

Palacký University Olomouc, residing at Křížkovského 8, 779 00 Olomouc (hereinafter referred to as "UP")

processes your personal data in accordance with *Regulation (EU) 2016/679 of the European Parliament and of the Council 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 as „Regulation "), namely as a **Personal Data Controller.**

UP processes your personal data implemented at UP **to the following extent:**

1. Name and surname, address, personal identification number, date and place of birth, address of permanent residence in the Czech Republic, nationality, information on the highest level of education achieved, sex, e-mail, data box identifier,
2. Information on academic degrees, telephone number in case you have voluntarily communicated or will communicated them to UP,
3. All other information that meet the definition of personal data which may arise in connection with implementation and administration of long-life education and LLLP whose graduates are awarded an internationally recognised degree (e.g. information on participation in learning activities, information on study results of learning activities) and in connection with the issuance of a micro-certificate for completed education (such as the date of issue, expiry date, identifier, etc.).

UP declares that it obtained or will obtain your personal data in the described scope from you as subject of personal data, prospectively during implementation of the LLLP or LLLP whose graduates are awarded an internationally recognised degree. UP obtains the personal data stated in points 1) and 2) by means of your written application, or registration the Portal of life-long learning at UP. UP is authorized to use data from the Basic Register of Residents to update your identification and address information, in accordance with applicable laws and regulations.

UP processes your personal data on the following legal basis:

- In accordance with Art 6 part 1 letter a) of the Regulation, i.e. the processing of personal data is based on your consent, which you give when registering in the LLL UP Portal and setting up a user account;
- In accordance with Art. 6 par. 1 letter b) of the Regulation, i.e. processing of personal data is **necessary for the performance of the LLLP Participation Contract** to which you are one of the parties, **or for application of measures taken before the conclusion of the Contract at your request**, specifically due to the fact that by expression of your interest in participation in the LLLP or in the LLLP whose graduates are awarded an internationally recognised degree you did an action that enables UP to process your personal data for the purpose conclusion of the Contract at your request (i.e. that was an action aimed at the conclusion of the LLLP participation Contract or LLLP whose graduates are awarded an internationally recognised degree participation Contract);
- In accordance with Article 6 par. 1 letter c) of the Regulation, i.e. processing of the personal data is **necessary for compliance with a legal obligation to which UP as the controller is subject;** to comply with such an obligations, UP performs the following:
    - under **Section 60 of the Act No. 111/1998 Sb., on higher education institutions,** personal data are processed for the purposes of the administration of LLLP or LLLP whose graduates are awarded an internationally recognised degreee, recording the study results of such programmes, issuing certificates of completion of the LLLP or LLLP whose graduates are awarded an internationally recognised degreee or their duplicate copies; as well as ensuring the accuracy and timeliness of the processed personal data by synchronizing it with the Basic Register of Residents;
- under **Section 3 of Decree No. 277/2016 Sb., on transfer of statistical data by higher education institutions,** where all higher education institutions are required to transfer to the Ministry of Education, Youth and Sports (hereinafter the "Ministry") the personal data, set out by this decree, of every participant and every graduate of the life-long learning programme, oriented to the performance of a profession or eligible for further study in the accredited study programmes, provided that it includes at least 50 hours per course, and of every participant, and of every graduate of the education in the LLLP whose graduates are awarded an internationally recognised degree.
- In accordance with Art 6 part 1 letter e) of the Regulation, i.e. the processing of personal data is based on the exercise of public authority pursuant to Sections 60(2) and 68(1)(d) of the Higher Education Act, whereby successful graduates of lifelong learning programmes may have the credits they have earned in lifelong learning programmes recognised by the university within accredited study programmes or within the field of education for which the university holds institutional accreditation.
- In accordance with Art 6 part 1 letter f) of the Regulation, i.e. the processing of personal data is based on the controller's legitimate interest in maintaining the micro-certificates in the digital repository.

In accordance with Article 5 and 6 of the Regulation, all your personal data will be **processed only for the following purposes**:

- registration in the LLL UP Portal and setting up a user account,
- administration of participation in a life-long learning programme or LLLP whose graduates are awarded an

internationally recognised degree, including recording the study results, issuing certificate of completion or its duplicate copy;
- entering into a contract to participate in a life-long learning programme or LLLP whose graduates are awarded an internationally recognised degree and performing the obligations thereunder, if need be assertion of rights arising therefrom;
- transfer of the data of the LLLP Participant to the Ministry if required by Section 3 ofDecree No. 277/2016 Coll., on transfer of statistical data by higher education institutions,
- issuing micro-certificates and maintain them in a digital repository,
- ensuring the accuracy and timeliness of the personal data being processed by synchronizing it with the Basic Population Register.

Within the framework of UP, your personal data will be collected and processed by the commissioned employees of UP.

Provision of your personal data by you is voluntary; in case you reject to provide your personal data necessary to enter into the LLLP participation contract or LLLP whose graduates are awarded an internationally recognised degree participation contract, if need be the data necessary to administer your participation in LLLP or LLLP whose graduates are awarded an internationally recognised degree, eventually the data that need to be transmitted to the Czech Ministry of Education, Youth and Sports, UP will not be able to implement your participation in the pertinent programme and neither will be able to conclude a contract to participate in such a programme or to issue a micro-certificate of completed education and keep it in a digital repository.

You acknowledge that your consent is voluntary and, in accordance with Article 7 of the Regulation, UP is obliged to inform you that you are entitled to withdraw your consent to the processing of your personal data by UP for the purposes of registration in the LLL UP Portal and the establishment of a user account at any time (either in part or in full), by sending a notice of withdrawal of consent addressed to UP, specifically to the following address: czv@upol.cz. However, the withdrawal of consent does not affect the lawfulness of the processing of personal data prior to the withdrawal of consent.

UP **will not share your personal data with third parties (recipients)** with exception of:

- the above-described case of the legal obligation to provide data on certain types of LLL participants to the Ministry of education, youth and sports or other authorities on the basis of a legal obligation,
- in the case of the issuance of micro-certificates of education, personal data is transferred to this person: Masaryk University, with the registered office at Žerotínovo nám. 617/9, 601 77 Brno, ID 00216224, as the processor of personal data, which provides the technical solution of micro-certificates and with which UP has concluded a contract for the processing of personal data.

UP will store your personal data **as long as any of the grounds for processing stated herein last**

UP has appointed a data protection officer who can be contacted at the following e-mail address: dpo@upol.cz or at Křížkovského 8, 779 00 Olomouc.

UP further instructs you on your rights pursuant to the articles 13 and 14 of the Regulation, eventually pursuant to the Art. 15 – 22, 34 and 77 of the Regulation as follows:

Under Article 15 of the Regulation, you may obtain from UP**confirmation** as to whether or not the personal data concerning you are being processed, and, where that is the case, you **may obtain access to these personal data and the related information defined in Art. 15 par. 1 letter a) – h) of the Regulation. You may be provided with one free copy of the processed personal data under the conditions laid down in the Art. 15 of the Regulation.**

Under Article 16 of the Regulation you may obtain**rectification** of the inaccurate personal data concerning you or **have incomplete personal data completed;**

Under the Article 17 of the Regulation, you have the right to **have UP delete the personal data** concerning you without undue delay under conditions set out in Article 17 of the Regulation.

Under conditions laid down in Article 18 of the Regulation, you may request UP to**restrict the processing** of personal data.

Under conditions laid down in Article 20 of the Regulation, you have the**right to personal data portability.**

Under conditions laid down in Article 21 of the Regulation, you**may object** to processing of the personal data.

Under the conditions laid down in Article 34 of the GDPR, you**are entitled to be informed of a personal data security breach** provided that such a breach is likely to result in a high risk to the rights and freedoms of natural persons.

Under Article 77 of the Regulation, you may**lodge a complaint with a supervisory authority**, in particular in the EU member state of your regular domicile, place of performance of employment or place where the alleged breach occurred, if you figure that by the processing of the personal data concerning you, the regulation is infringed.

Further information on your rights in the field of personal data processing are stated in articles 15 – 22 and 34 of the Regulation and the UP website (https://www.upol.cz/univerzita/ochrana-osobnich-udaju/).

By checking the box, you consent to the processing of your personal data for the purposes of registration to the LLL UP Portal and the creation of a user account for the period until you withdraw your consent or cancel your user account.

As a data subject, by completing the registration to the LLL UP portal or by submitting an application for an LLL programme, you confirm that you have been informed of the details of the processing of your personal data to the extent described above.