



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Privacy notice for the Students and PhD Students at Sofia University “St. Kliment Ohridski”

Information regarding the Controller:

Legal name	Sofia University “St. Kliment Ohridski”
VAT	BG000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., 1504, Sofia, Bulgaria
Address of correspondence	15 Tzar Osvoboditel Blvd., 1504, Sofia, Bulgaria
Phone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

Information regarding the Data Protection Officer:

Legal name	Assoc. Prof. Parvan Parvanov, PhD
Address of correspondence	15 Tzar Osvoboditel Blvd., Room 12, 1504, Sofia, Bulgaria
Phone number	(+359) 2 930 84 23, (+359) 2 943 43 19
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Information regarding the supervisory authority:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Phone number	(+359) 2 915 3 518
Webpage	www.cdpd.bg



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Sofia University “St. Kliment Ohridski” (Hereinafter referred to as “Controller”, “the University” or “we”) performs its activities in accordance with the Personal Data Protection Act and the EU Regulation 2016/679 of the European Parliament and 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. This document aims to inform you about all aspects of the collection and processing of your personal data by the University and the rights you have, in relation to that processing.

Legal grounds for collection, processing and storage of your personal data

Art. 1. (1) The University collects and processes personal data for the following categories of persons for enrollment at the University during admission and for the conduct and administration of the educational process in the University:

- Students, enrolled in full-time or part-time learning form for obtaining “Bachelor” or “Master” degree;
- PhD students.

(2) The University collects and processes your personal data as students enrolled in full-time or part-time education in the University, including students on exchange programmes or practices, and assigned PhD students, under art. 6, para. 1, Regulation (EU) 2016/679 (GDPR), and, in particular, based on the following grounds:

- For compliance with a legal obligation to which the controller is subject;
- For the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Your explicit consent for processing some categories of personal data.

(2) The University performs its activities in accordance with the legislation and the Higher Education Act, published in State Gazette No 112 of December 1995, and with all subsequent amendments and additions of the Act, Decrees of the Council of Ministers, as well as with the Organization and activity regulations of the Sofia University “St. Kliment Ohridski” and the Decisions of the Academic Council.

Objectives and principles in the course of collection, processing and storage of your personal data

Art. 2. (1) The University collects and uses your personal data as an enrolled students, which is needed for your identification as student in this University and for carrying out the studying process, providing administrative services and other activities, necessary in the process of study.

(2) The University collects and processes personal data of PhD students for the purposes of administration of the process of enrollment, as well as during the whole learning process and obtaining PhD degree.



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(3) The University uses your personal data in anonymised form, which does not allow your identification, for the purposes of statistics and summary of the information on trends in admission, enrollment in the University, the enrolled PhD students, etc.

Art. 3. (1) In the course of collecting, processing and storage of your personal data, as enrolled students in Sofia University “St. Kliment Ohridski”, the University adheres to the following Principles:

- lawfulness, fairness and transparency;
- purpose limitation of the processing personal data;
- proportionality with the processing purposes and data minimisation;
- accuracy and relevance of the data;
- storage limitation in accordance with purpose achievement;
- integrity and confidentiality of the processing and ensuring an adequate level of security of the personal data.

(2) The University collects and uses only your personal data, which is necessary for enrollment of newly accepted students, carrying out the educational process, the process of enrolling PhD students and carrying out the learning process.

Art. 4. In the course of processing and storage of personal data, the University can process and store personal data, including to perform its obligations towards state and municipal bodies.

What kind of personal data does the University collect, process and store regarding the newly accepted and enrolled students

Data for students, enrolled in full time or part time education

Art. 5. (1) The University performs the following operations with personal data, provided by you as a student, enrolled in full-time or part-time education for obtaining “Bachelor” or “Master” degree:

- **Enrollment of new students:** The University collects and processes personal data, provided by you at the enrollment for admission campaign or admission campaign for “Master” degree after completed university education, as well as personal data in accordance with model set of documents for newly enrolled students for the purposes of enrollment in the selected studying form for the speciality, for which you have successfully been accepted, and providing of faculty number in the relevant Faculty.
 - **Personal data, collected and processed in the performance of operation:** Name, father’s name and surname; Another name, signed in the Personal identity card of the person, if he/she has one; Personal identification number/Personal number of a foreigner; data, regarding completed university education (in cases of submitting for “Magister” degree after completed high education); Email address; Address; Phone number; Nationality; Data for



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completed secondary education; Copy of Diploma; Decisions of expert medical commissions (if there are circumstances for this); Data under ISIC card, etc.

Conclusion of Data protection impact assessment of the operation: The Operation “Enrollment of newly accepted students” is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

- **Administration of the tuition process:** the University processes the data of its students, which data is provided at the enrollment for the purposes of creating a profile of every student in the Information system for students’ information (CYCI), performance of the tuition process, enrollment in exam protocols, description of exam results, enrollment in lists with exam results, actualization of students files in the main books and SUSI system, issue of assurances, academical inquires, official notes and other documents wanted by the student.
 - **Personal data, collected and processed in the performance of the operation:** The University processes personal data of the students, which are previously collected at the moment of their enrollment for the administration of the tuition process. When there is a request from student for issuance of credentials, reference or other document, the Controller uses already collected data for this student, as in some cases it is possible to require additional data.

Conclusion of Data protection impact assessment of the operation: The Operation “Administration of tuition process” is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).
- **Graduation of students:** The University processes the data of its students whose data is provided at the enrollment for the purposes of issuance of a diploma for completed university education degree.
 - **Personal data, collected and processed in the performance of the operation:** The University processes personal data of the students, which are previously collected at their enrollment.

Conclusion of Data protection impact assessment of the operation: Operation “Graduation of students” is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).
- **Application and qualification for scholarships, grants and awards:** The University processes personal data of its students during the campaigns for submission of scholarship documents and the ranking for the relevant semester, for the purposes of scholarship payments, grants payments and payments of awards of students due to their grades.
 - **Personal data collected and processed in the performance of the operation:** The University processes personal data of the students, which is previously collected at their enrollment and, in addition, collects and processes data, regarding the bank account of the student. In accordance with the Rules for scholarships of the Sofia university “St. Kliment Ohridski” and in connection



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with the reclaimed scholarship or grant, it is possible to be collected extra data, such as family data, health data, etc. .

Conclusion of Data protection impact assessment of the operation: Operation „Application and qualification for scholarships, grants and awards“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

- **Application and qualification for student accommodation :** The University processes personal data of its students while carrying out the application and qualification for student accommodation..

➤ **Personal data, collected and processed in the performance of the operation:** The University processes student’s personal data at the submission of a claim by him (personal name, address, faculty number, phone number, email address, etc.), as there is a possibility for collecting of additional data, for example family data, health data, etc.

Conclusion of Data protection impact assessment of the operation: The Operation “Application and qualification for accommodation” is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

- **Exchange programmes for Bulgarian and foreign students and PhD students:** The University processes personal data of students and PhD students, who want to apply for exchange programmes, including “Erasmus” programme, for the purposes of participation in the ranking and performance of exchange programmes.

➤ **Personal data collected and processed in the performance of the operation:** The University collects and processes personal data of the student or PhD student in accordance with approved form for application (three names, address, birth date, personal data from the identity card, phone number, email address, etc.).

Conclusion of Data protection impact assessment of the operation: Operation “Exchange programmes for Bulgarian and foreign students and PhD students” is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The University collects the data only from the data subjects, unless in limited cases, in which it is necessary to obtain information for third parties.

What personal data does the University collect, process and keep about the PhD students

Art. 6. (1) The University collects and processes personal data, regarding the PhD students, in accordance with the submitted documents for application for PhD students and for their qualification.



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(2) The University performs the following operations with personal data, provided by you as a PhD student:

- **Performance of PhD activity:** The purpose of the operation is administration of the process of enrolment of the PhD student in the relevant speciality, carrying out the tuition process, exam taking process, receiving PhD degree, making payments, etc.
 - **Personal data, collected and processed in the performance of the operation:** names, address, PIC, phone number, email address, data, regarding completed university education and received university degree, bank account data, etc.
- Conclusion of Data protection impact assessment of the operation:** Operation "Performance of PhD activity" is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

Art. 7. (1) The University does not collect and process personal data, regarding the following:

- revealing racial or ethnic origin;
- revealing political, religious or philosophical beliefs, or trade union memberships;
- genetic and biometric data, data, concerning health or sexual life or sexual orientation.

(2) The University collects and processes personal data, concerning the health of the students and the PhD students, if explicit consent is given to the processing and under art. 9, para. 2, letter "a" of Regulation (EU) 2016/679, for the purposes of providing conditions, needed for these persons in accordance with the Rules of the University.

(3) The personal data are collected by the Controller from the persons, whom it concerns.

(4) The Controller does not make automatic data decision making.

Duration of personal data storage

Art. 8. (1) The University keeps your personal data as a student for the whole tuition period until completion of educational degree, after which the students' files are archived and stored for an indefinite period for the purposes of protection of the legitimate interests of the Controller.

(2) The University keeps your personal data as PhD students for the whole learning period until the completion of the PhD degree and dismissal of the PhD student. After the expiration of the tuition period, the data is archived and stored for an indefinite period for the purposes of protection of the legitimate interests of the Controller.

(3) The University keeps documents, files, etc., in accordance with the legal requirements of the legislation in force and the Nomenclature for the files with the periods of their storage, approved by the Rector.

Transmission of your personal data for processing



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Art. 9. (1) The Controller is allowed on its own discretion to transmit all or part of your personal data to processor for performing the purposes of processing, which you have agreed in compliance with the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The Controller informs you in case of intention to transmit all or part of your personal data to third countries or international organizations.

Your rights in the course of collection, processing and storage of your personal data

Withdraw of the consent for processing of your personal data

Art. 10. (1) If you do not want the University to continue to process all or part of your personal data, which are processed on the ground of given consent, for specified or all processing purposes, you can, at any time, withdraw your consent for processing by sending a request, incorporated in free text, or to fill the form in accordance with Appendix No 1 by email or on paper.

(2) The Controller is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting an Identity Card on site.

(3) The withdraw of the consent does not affect the examination of the processing of the personal data, provided by you until the moment of the withdraw of the consent.

(4) You can at any time withdraw your consent for processing your personal data for the purposes of direct marketing.

(5) The University is allowed to continue to process all or part of your personal data, if there is a legal obligation for the processing or for the purposes of protection of the University's legal interests.

Right of access

Art. 11. (1) You have right to request and receive confirmation from the Controller if there is a processing of personal data, related to you.

(2) The Controller is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning, by presenting Identity Card on site.

(3) You have right to gain access to the data, related to you, as well as to the information, regarding collecting, processing and storage of your personal data.

(4) The Controller provides you, if there is a request from you, a copy of the processed personal data, related to you, in electronic or other appropriate form.

(5) Provision of data access is free, but the Controller keeps his right to determine administrative fee, in case of repeatability or excessiveness of the requests.



Right of correction or completion

Art. 12. (1) You have right to request from the controller to:

- to rectify the inaccurate personal data, concerning you;
- to complete incomplete personal data, concerning you.

(2) The Controller is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning by presenting an Identity Card on site.

Right to erasure (“Right to be forgotten”)

Art. 13. (1) You have the right to request the Controller to erase all or part of your personal data, and the Controller has the obligation to erase such data without undue delay, when one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You have withdrawn your consent on which the processing is based and where there is no other ground for processing;
- You have objected to the processing of personal data, relating to you, and there are no legal grounds for the processing, which have advantage;
- Personal data have been processed illegally;
- Personal data shall be erased with the purpose of legal obligation under European Union Law or the law of Republic of Bulgaria, which obligations are in force against the Controller;
- Personal data have been collected in connection with the offer of services of information society.

(2) The Controller is not obliged to erase the personal data, if he keeps and processes them:

- For exercising the right of freedom of speech and the right of information;
- For compliance with legal obligation, which requires processing, determined in European Union Law or the law of Republic of Bulgaria, which obligation is in force against the Controller or for performance of a task in public interest or for performance of official powers, provided to the Controller;
- In public interest, related to the public health;
- For the purposes of archiving in public interest, for scientific or historic researches or for statistics purposes;
- For establishment, exercise or defence of legal claims.

(3) In case that the grounds, described in art. 1, are present, the Controller will erase all your personal data, except your Personal identification code (PIN), for the purposes of accountability.



(4) To exercise your right to be forgotten, you shall send a request in free written form or to fill in the form in accordance with Appendix No 2 by email or on paper, and you shall identify yourself by presenting an Identity card.

Right to restriction of processing

Art. 14. (1) You have right to request the Controller to restrict the processing of the personal data, concerning you, when:

- The accuracy of the personal data is contested by you, for a period, which allows the Controller to check the accuracy of the data;
- The processing is unlawful, but you oppose the erasure of personal data, and request only for the restriction of their usage;
- The Controller no longer needs the personal data for the purposes of the processing, but you require them for establishment, exercise or defence of legal claims;
- You objected to the processing pending the verification whether the legitimate grounds of the controller override your legal interests.

(2) The Controller is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting on site- an Identity Card.

(3) The University is allowed to continue the processing of your personal data, if there is a necessity for establishment, exercise or defence of legal claims, defence of another natural person or in accordance with important requirements of public interests.

Art. 15. (1) In case that you have given your consent to the processing of your personal data or the processing is necessary for the performance of a contract with the collector or in case your personal data is processed by automated means, you can after identifying yourself in front of the collector:

- ask the collector to provide you with your personal data in machine-readable format and to transmit those data to another controller;
- ask the controller directly to transmit your personal data to another controller designated by you, when this is technically possible.

(2) The controller can request you to verify your identity and the identity between you and the data subject, by asking you to present identity document on site.

(3) You can exercise right to data portability via submitting request in free text or filled form in accordance with Annex № 3 via e-mail or on paper.

Right to receive information

Art. 16. You have the right to require from the University to inform you about all recipients, to whom your personal data, for which has been required rectification, erasure or restriction of processing, have been disclosed. The University is allowed to refuse to provide this information if this is impossible or involves disproportionate effort.



Right to object

Art. 17. You have the right to object at any time to processing of personal data concerning you including processing for the purpose of profiling or direct marketing.

Your rights in case of personal data breach

Art. 18. (1) When the University detects personal data breach, which is likely to result in a high risk to your rights and freedoms, the University communicates the personal data breach to you without undue delay, as well as the measures taken or proposed to be taken.

(2) The controller is not obliged to inform you if:

- the controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach;
- the controller has taken subsequent measures which ensure that the high risk to your rights is no longer likely to materialize;
- it would involve disproportionate effort.

Persons, to whom your personal data is provided

Art. 19. For the described purposes of processing your personal data, the University is allowed to provide your personal data to third parties data processors, who comply with all requirements of legality and security when processing and storing your personal data.

Art. 20. The University provides your personal data to the Ministry of Education and other public authorities on the grounds, laid down by the Bulgarian legislation and for carrying out statutory duties.

Art. 21. The personal data of the students is processed with taken measures to restrict the access to the personal data and high level of security and protection, as the employees of the University and its administrative units, including the relevant Faculty, as well as academic teachers, have access and may process personal data of the students, only regarding conducting the activities of the University.

Art. 22. The controller does not transfer your personal data to third States or international organisations, unless there is a ground for that and after the data subject has been duly informed.

Art. 23. In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592



SOFIA UNIVERSITY "ST. KLIMENT OHRIDSKI"

Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone	+(359) 2 915 3 518
Website	www.cdpd.bg

Art. 24. You can exercise all your rights regarding the protection of your personal data via the forms attached to this Privacy notice. Of course, these forms are not obligatory and you can address your requests in any form, which contains a statement for that and identifies you as the data subject.



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Appendix № 1

Exemplary forms of withdrawal of consent for processing purposes

Your name*:

Personal Identification Number*:

Feedback data (e-mail, telephone)*:

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered address	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Telephone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

I withdraw my consent for collection, processing and storage of the following personal data, provided by me:

All personal data provided by me

Only these data

For the following purposes:

Following purposes:

.....

All purposes

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592



SOFIA UNIVERSITY "ST. KLIMENT OHRIDSKI"

Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cdpd.bg

Signature:



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Appendix № 2 –

Request “to be forgotten” – for erasure of personal data related to me

Your name*:

Personal Identification Number *:

Feedback data (e-mail, telephone) *:

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered address	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Telephone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

I request all personal data, which you are collecting, processing and storing, provided by me or third persons, which is related to me, according to the specified identification, to be erased from your database.

I declare that I am aware of the fact that all or part of my personal data may continue to be collected processed and stored from the collector for the purpose of performing legal obligations.

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cdpd.bg

Signature:



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Appendix № 3 – Request for portability of personal data

Your name*:

Personal identification number *:

Feedback data (e-mail, telephone)*:

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered address	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Telephone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

I request all personal data related to me, which has been collected, processed and stored in your database to be sent to:

e-mail:

Collector – recipient of the data:

Name

**Identification number (UIN,
BULSTAT, other)**

E-mail

Please, transmit my personal data in the following format:

XML

JSON

CSV

Other:



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I wish my personal data in the chosen format to be transmitted to me or specified by me data collector:

to the specified e-mail

to a physical carrier or electronic carrier (CD, DVD, USB)

other:

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cdpd.bg

Signature:



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Appendix № 4 –

Request for rectification of personal data

Your name*:

Personal identification number *:

Feedback data (e-mail, telephone) *:

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered address	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Telephone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

I request the following personal data which you collect, process and store, provided by myself or third party, related to me, to be rectified as it follows:

Personal data, which shall be rectified:

.....

I request the mentioned personal data to be rectified as it follows:

.....

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Telephone number	+(359) 2 915 3 518
Website	www.cdpd.bg

Signature: