#### PRIVACY POLICY AND NOTICE ON THE PROCESSING OF PERSONAL DATA BY VYSOKÁ ŠKOLA MANAŽMENTU

(hereinafter referred to as the "Notice")

The University of Management, with its registered office at Panónska cesta 17, 851 04 Bratislava, Business ID: 36 120 901 (hereinafter referred to as "VŠM"), as the controller, takes the protection of personal data very seriously and consistently cares about the protection of personal data provided to it and which it processes.

In addition to its own study programmes, VŠM provides, together with the CITY UNIVERSITY OF SEATTLE, with its registered office at 521 Wall Street, Suite 100, Seattle WA 98121, the United States of America (hereinafter referred to as "**CityU**"), on the basis of an academic cooperation agreement, also study programmes CityU, namely Bachelor of Science in Business Administration and Master of Business Administration as individual study programmes or dual study programmes in connection with study programmes provided by VŠM. If you apply for any CityU study programme, VŠM and CityU will have the status of mutual controllers when (i) assessing your application for admission to the study programme (including enrolment and registration), and (ii) in fulfilling the obligations arising from the Academic Cooperation Agreement after your admission.

Therefore, at this point we would like to inform you about some aspects of the processing of personal data of VŠM and/or CityU and your related rights.

## HOW CAN YOU CONTACT VŠM REGARDING THE PROCESSING OF PERSONAL DATA?

VŠM can be contacted in connection with the processing of personal data as follows:

- at the address: Vysoká škola manažmentu / City University of Seattle, Panónska cesta 17, 851 04 Bratislava;
- by e-mail to: <u>dpo@vsm.sk</u>

In the Agreement on the Mutual Processing of Personal Data (hereinafter referred to as the "Agreement"), VŠM has undertaken to perform the function of the representative of the CityU in the territory of the Slovak Republic for the data subjects and the Office for Personal Data Protection in connection with the processing of your personal data for the purposes in which VŠM and CityU have the status of mutual controllers. Therefore, you can contact VŠM, as one of the mutual controllers, in all questions related to the processing of your personal data. Notwithstanding the above, you can also exercise your rights against CityU.

In this Notice, we provide you with information that VŠM, as an independent controller or representative of a mutual controller, is obliged to provide when obtaining your personal data.

#### WHO IS THE RESPONSIBLE PERSON WITHIN THE VŠM?

The responsible person within the VŠM is: dpo@vsm.sk

The tasks of the data protection officer shall include in particular:

- providing information and advice to VŠM and VŠM employees who process personal data on their legal obligations in relation to the protection of personal data;
- monitoring the compliance of the processing of personal data of the VŠM with the law and with the rules of the VŠM in relation to the processing of personal data;
- cooperation with the supervisory authority;
- advising, upon request, on the data protection impact assessment and monitoring its implementation

pursuant to Article 35;

• to act as the contact point for the supervisory authority on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate, on any other matters.

## HOW DOES VŠM PROCEED WHEN EXERCISING YOUR RIGHTS?

Upon your request, VŠM will provide all information related to the processing of your personal data in a concise, transparent, comprehensible and easily accessible form. The information shall be provided in writing or by other means, including, where appropriate, by electronic means. If you submit a request by electronic means, the information will be provided by electronic means where possible, unless otherwise requested.

The VŠM will provide you with information on the measures taken on the basis of your request in exercising your rights without undue delay and in any event within one month of receipt of the request. That period may be extended by a further two months where necessary, taking into account the complexity of the application and the number of requests. However, the VŠM is obliged to inform you of any such extension within one month of receipt of the request, together with the reasons for the missed deadline.

If the VŠM does not take measures on the basis of your request, it is obliged to inform you immediately, and no later than one month from the receipt of the request, about the reasons for inaction and about the possibility of filing a complaint with the supervisory authority and seeking a judicial remedy.

VŠM is obliged to provide you with all information and take the necessary measures free of charge. If your requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the VŠM may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or of notifying or taking the action requested, or
- refuse to act on a request.

#### WHAT ARE YOUR RIGHTS IN RELATION TO THE PERSONAL DATA PROVIDED?

As the data subject, you have the following rights in connection with the provision of your personal data to VŠM and/or CityU. If you want to exercise any of the right listed below, contact VŠM at any of the above contact details or fill in and send to the VŠM form - request for exercising the right of the data subject, which is available at ttps://www.vsm.sk/svk/o-skole/media/ziadost/

#### **1.** The right to request access to personal data concerning you:

You have the right to obtain confirmation as to whether VŠM and/or CityU processes personal data concerning you.

If VŠM and/or CityU process your personal data, you have the right to find out which of your data are processed and the right to the following information:

- information on the purposes for which VŠM and/or CityU processes your personal data;
- what categories of your personal data VŠM and/or CityU processes;
- to whom your personal data have been or will be provided;
- the expected period for which VŠM and/or CityU will store your personal data;
- information on which of the rights listed here apply to you;
- information on the right to lodge a complaint with a supervisory authority;
- information on where VŠM and/or CityU obtained your personal data from, unless you provided it directly by you;
- whether your personal data is subject to automated decision-making, including profiling;

• information on appropriate safeguards for the security of the transfer of your personal data if they are transferred to a third country or an international organization.

Based on the exercise of the right of access to your personal data, VŠM will provide you with a copy of the personal data processed by VŠM and/or CityU.

#### 2. The right to request the correction of personal data:

If any of your personal data processed by VŠM are not correct, you have the right to have VŠM correct your incorrect personal data. Incorrect personal data may be processed, for example, if your surname or address changes.

You also have the right to supplement your personal data processed by VŠM if they are incomplete.

#### 3. Right to erasure of personal data:

You have the right to obtain from VŠM and/or CityU the deletion of personal data concerning you without undue delay if any of the following conditions is met:

- Your personal data are no longer necessary for the purposes for which VŠM and/or CityU obtained or processed them;
- you have withdrawn your consent to the processing of your personal data and there is no other legal basis for their processing by VŠM and/or CityU;
- you have exercised the right to object to the processing of your personal data and there are no overriding legitimate reasons for their processing;
- VŠM and/or CityU processed your personal data unlawfully;
- VŠM and/or CityU has a legal obligation to delete your personal data.

If VŠM and/or CityU have published your personal data, the deletion of which you have the right to, the VŠM and/or CityU will to a reasonable extent ensure the deletion of all links to such personal data, their copies and replicas.

However, you will not be able to exercise your right to erasure in cases where VŠM and/or CityU process your personal data that are necessary:

(a) for exercising the right to freedom of expression and information;

- (b)for compliance with a legal obligation which requires processing by Union or Member State law to which the VOM is subject or for the performance of a task carried out in the public interest;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, if the exercise of your right is likely to make it impossible or seriously difficult to achieve the objectives of such processing, or

(d)for the establishment, exercise or defence of legal claims.

#### 4. Right to restrict of processing of personal data:

You have the right to request that VŠM and/or CityU restrict the processing of your personal data:

- for the time while VŠM and/or CityU verifies the accuracy of your processed personal data, if you have objected to this accuracy;
- instead of deletion, if the processing of your personal data by VŠM and/or CityU is unlawful;
- for the time when you need them for the establishment, exercise or defence of legal claims, even if the VŠM and/or the CityU no longer need them for processing purposes;
- for the time it is verified whether the legitimate reasons on the part of VŠM and/or CityU outweigh your legitimate interests, if personal data are processed on this legal basis and you have objected to their processing for reasons relating to your particular situation.

If the processing of your personal data is restricted, VŠM and/or CityU may only store them for the duration of such restriction.

#### 5. Right to accuracy of personal data:

If VŠM and/or CityU performs the processing of your personal data by automated means and the processing is based on your consent, or the processing of your personal data is based on a contractual relationship between you and VŠM and/or CityU, you have the right to transfer such your personal data.

The right to transfer your personal data lies in the fact that you can obtain your personal data that you have provided to VŠM and/or CityU in a structured form and you have the right to subsequently transfer it to another person who will process it. You also have the right to transfer it directly to the VŠM and/or CityU to another person who will process them, if technically feasible.

Please note that the use of your right to transfer personal data does not mean that they will be automatically deleted by VŠM and/or CityU and does not affect the retention period of VŠM and/or CityU.

## 6. How can you withdraw the consent you have given to VŠM and/or CityU for the processing of your personal data?

If VŠM and/or CityU process your personal data on the basis of the consent you have given, you can revoke this consent at any time.

You withdraw your consent by filling out the following form: online form

If you prefer another way to withdraw consent, you can also withdraw consent:

- by sending a letter to: Vysoká škola manažmentu / City University of Seattle, Panónska cesta 17, 851 04 Bratislava, stating that you withdraw your consent to the processing of personal data;
- by sending an e-mail to: <u>dpo@vsm.sk</u>, stating that you withdraw your consent to the processing of personal data.

Please note that the withdrawal of consent does not affect the lawfulness of the processing of your personal data that occurred on the basis of your consent before its withdrawal.

#### 7. When and how can you object to the processing of your personal data by VŠM?

You have the right to object to the processing of personal data concerning you, insofar as the processing takes place:

- on the legal basis, which is the necessity of processing for the performance of a task carried out in the public interest or in the exercise of public authority vested in the VŠM and/or the CityU;
- on the legal basis, which is the necessity of processing for the purpose of the legitimate interests of VŠM and/or CityU or a third party;
- for the purpose of direct marketing.

The consequence of exercising your right to object to the processing of personal data is that VŠM and/or CityU may no longer process your personal data unless:

a) fails to demonstrate necessary legitimate interests that outweigh your rights and interests, orb) the grounds for making a legal claim.

These exceptions do not apply to processing for the purpose of direct marketing. If your personal data

are processed for the purpose of direct marketing and you object to their further processing, VŠM and/or CityU will terminate their further processing.

## 8. To whom can you lodge a complaint if you believe that the processing of your personal data is not carried out in accordance with the law?

If you believe that the processing of your personal data by VŠM and/or CityU is not carried out in accordance with the law, you may file a complaint with the supervisory authority.

The competent supervisory authority shall be:

#### Office for Personal Data Protection of the Slovak Republic

Hraničná 12 820 07 Bratislava 27 Slovak Republic

If you have your habitual residence or place of work in another Member State of the European Union, you may also lodge your complaint with the supervisory authority in that country.

## IS ME AND MY PERSONAL DATA SUBJECT TO AUTOMATED DECISION-MAKING, INCLUDING PROFILING?

Automated individual decision-making within the meaning of Article 22 of the GDPR may occur when verifying the degree of originality of students' final theses, which VŠM is obliged to verify through an anti-plagiarism system according to § 63 par. 7 of the Higher Education Act. The anti-plagiarism system and the Central Register of Final and Qualification Theses are operated by the Centre of Scientific and Technical Information of the Slovak Republic. Assessment of final thesis with other final and qualification theses is a legal obligation of a private higher education institution.

# IS THE PROCESSING OF MY PERSONAL DATA TRANSFERRED TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION?

If you register for a CityU study program, your personal data will be transferred to the USA on the basis of standard data protection clauses pursuant to Article 46 (2) GDPR.

# WHAT ARE THE OBLIGATIONS OF AUTHORIZED PERSONS IN VŠM WHO PROCESS YOUR PERSONAL DATA?

Each authorized person is obliged according to § 79 of Act no. 18/2018 Coll. on the protection of personal data to maintain confidentiality about personal data with which he comes into contact; they may not be used even for personal use and may not publish them without the consent of the operator and provide or make them available to anyone, unless otherwise specified in the Regulation or in the Act, while the obligation of confidentiality continues even after the termination of the employment or similar relationship. The legal obligation of confidentiality also applies to other natural persons who come into contact with personal data in the course of their activities.

Access to information systems on the computer network is granted only to authorized persons who are assigned their personal identifier and personal password, about whom they are obliged to maintain confidentiality and not to store them in a way that could lead to their disclosure to another person.

# FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DOES VŠM AND/OR CITYU PROCESS YOUR PERSONAL DATA?

VŠM and/or CityU processes your personal data for the following purposes:

## I AM A STUDENT

- <u>Admission procedure</u>: within which you provide your personal data to the extent specified in the application. The provision of personal data is necessary for the processing of the received application, on the basis of which the admission procedure to the university begins, and the legal basis for processing is the fulfillment of our legal obligation.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to InterWay, a.s., ID: 35 728 531, with its registered office at Stará Vajnorská 21, 831 04 Bratislava, which provides web hosting services to VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored until the day of enrolment at the VŠM, after which they will be processed for the purpose of maintaining the personnel component of students and maintaining the academic information system (ESO, PeopleSoft).

- <u>Contacting applicants with study offers: VŠM and/or CityU processes your</u> contact details to the extent specified in the application form for the purpose of further contacting you (marketing), if for any reason you do not become a student of VŠM and/or CityU. The provision of contact details is not necessary for the processing of the received application and therefore you do not have to grant it to VŠM and/or CityU.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to InterWay, a.s., ID: 35 728 531, with its registered office at Stará Vajnorská 21, 831 04 Bratislava, which provides web hosting services to VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for a period of 2 years from the beginning of the academic year for which you have registered at VŠM and/or CityU.

Provision of information: personal data in the scope of name, surname, email, address, or other data that you have provided in the electronic form request for information on the VŠM website will be processed on the basis of your consent. The provision of this personal data is necessary to process your request for information and send you information. Without your consent, VŠM will not be able to provide you with information about the university within the scope of your question/request.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to InterWay, a.s., ID: 35 728 531, with its registered office at Stará Vajnorská 21, 831 04 Bratislava, which provides web hosting services to VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for a period of 2 years from the granting of consent.

- <u>Agenda Study Department - Admissions:</u> VŠM and/or CityU processes your personal data to the extent of data stated on certificates and other documents about students. The provision of such

personal data is necessary for the fulfilment of legal obligations arising from their nature. Without providing personal data provided on student certificates and other documents that will form part of your personnel component, VŠM will not be able to assess your requests. In some cases, your personal data are also processed for the purposes of legitimate interests, or the processing is necessary for the performance of a contract to which you are a party.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within VŠM and/or CityU. In the case of external processing of your personal data, personal data processing agreements will be concluded with processors.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period resulting from the registry plan of the VŠM or from the Act on Archives and/or in accordance with the personal data retention policy of CityU.

<u>Library</u>: to which you provide your personal data in the scope of: name, surname, email, address, contact, borrowed title and date of borrowing. These personal data of yours as a borrower from the VŠM library are processed by VŠM for the purpose of fulfilling the contractual – borrowing – relationship.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to authorized employees of VŠM who work in the library.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the duration of your membership in the library.

 <u>ONLINE LEARNING PORTAL – LMS Moodle/BrightSpace</u>: The processing of personal data in the scope of name, surname, e-mail, IP address of the user is necessary for the purposes of the legitimate interests pursued by VŠM and/or CityU, which are the creation of educational systems and electronic courses on the Internet.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within VŠM and/or CityU. In the case of external processing of your personal data, personal data processing agreements will be concluded with processors.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the duration of your studies at VŠM and/or CityU.

- <u>Management of the academic information system ESO (student register)/PeopleSoft</u>: to the extent of personal data from applications for study and documents on previous studies. The ESO and/or PeopleSoft information system allows you as a student to access the academic information system and use all its modules for the status of a student of VŠM and/or CityU. These personal data of yours as a student of VŠM and/or CityU are processed for the purpose of fulfilling the legal obligation of VŠM.

#### To whom will my personal data be disclosed?

Personal data in the above scope will be provided to the Ministry of Education, Science, Research and Sport of the Slovak Republic, to the Central Register of Students, the Centre of Scientific and Technical Information of the Slovak Republic, CCKM SYTC, Transdata s.r.o, Wolters Kluwer, Foreign Police, institutions that carry out TOEFL and Accuplacer testing.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period resulting from the registry plan of the VŠM or from the Act on Archives and/or in accordance with the personal data retention policy of CityU.

- <u>VŠM uploader: VŠM</u> processes your personal data in the scope of name, surname and IP address, as it is necessary for the purposes of legitimate interests, which VŠM is obliged to pursue in order to perform internal control of the originality of written works of students (especially bachelor and diploma works) and verify that they were not plagiarized by students.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within the VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for 70 years.

<u>Assessment of scholarship applications</u>: VŠM processes your personal data within the scope of the data specified in the scholarship applications. VŠM processes your personal data for the purpose of fulfilling VŠM's legal obligation arising from § 95-97 of the Higher Education Act.

#### To whom will my personal data be disclosed?

Personal data to the above extent processed internally within the VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for 10 years.

- <u>Selection procedure for a study period at a university abroad within the Erasmus+ programme</u>: to the extent of personal data provided in the application form, based on your consent. The provision of your personal data is not mandatory, but it is necessary for the processing of the received application, on the basis of which the selection procedure for an exchange stay at a partner university takes place.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to the respective partner higher education institution abroad.

#### How long will my personal data be stored?

Your personal data will be processed and stored for a period of 5 years from the beginning of the academic year for which you have registered.

#### Is my personal data transferred abroad or to international organizations?

Your personal data contained in the Erasmus+ exchange selection procedure will be sent to the partner university abroad you selected in your application.

<u>Applications for evening courses:</u> VŠM processes your personal data in the scope of name, surname, postal address, city, email, telephone for the purpose of registering those interested in evening study. The provision of personal data is based on your consent in connection with your interest in attending one of the evening courses offered by VŠM. The provision of your personal data is not mandatory, but VŠM cannot process your application for an evening course for which you have registered or organize evening courses without it.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to InterWay, a.s., ID: 35 728 531, with its registered office at Stará Vajnorská 21, 831 04 Bratislava, which provides web hosting services to VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for a period of 2 years from the granting of consent.

## I AM A JOB SEEKER

- Storage in the database of job seekers: within which you provide your personal data to the extent specified in the sent CV, motivation letter and their attachments. The legal basis for the processing of personal data is your consent to be included in the database of job seekers. Giving your consent is necessary to assess you as a job seeker and to contact you if you are interested.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to Profesia, spol. s r.o., ID: 35 800 861, with its registered office at Pribinova 19, 811 09 Bratislava.

#### How long will my personal data be stored?

Your personal data will be processed and stored for a period of 3 years from the granting of consent.

#### I AM AN EMPLOYEE

- <u>Conclusion of an employment contract</u>: VŠM processes your personal data to the extent specified in the employment contract. This is the legal basis for the processing of personal data pursuant to Article 6(1)(b) GDPR, i.e. in connection with the performance of a contract.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within the VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period necessary to achieve the specified purpose, or for the period required of the VŠM by relevant legislation, namely payroll certificates for 50 years, payroll slips, tax reports, payroll agenda for 10 years, personal files of employees 70 years after birth, tax statements for 10 years.

- <u>Management of the employee's personnel component</u>: VŠM processes your personal data to the extent of data resulting from documents forming the employee's personal file, including the legally

required data of the employee's spouse and children. VŠM processes your personal data to fulfill the legal obligation of VŠM imposed on it by special legal regulations. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) GDPR.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within the VŠM. VŠM also provides your data to the register of employees of higher education institutions, which is administered by the Ministry of Education, Science, Research and Sport of the Slovak Republic.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period necessary to achieve the specified purpose, or for the period required of the VŠM by relevant legislation, namely payroll certificates for 50 years, payroll slips, tax reports, payroll agenda for 10 years, personal files of employees 70 years after birth, tax statements for 10 years.

<u>Payroll accounting</u>: VŠM processes personal data on employees, which are the basis for the processing of wages and salaries to the extent necessary for the purpose of payroll administration. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) of the GDPR, i.e. the fulfillment of the legal obligation of the VŠM arising from the Accounting Act.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be processed internally within the VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period necessary to achieve the specified purpose, or for the period required of the VŠM by relevant legislation, namely payroll certificates for 50 years, payroll slips, tax reports, payroll agenda for 10 years, personal files of employees 70 years after birth, tax statements for 10 years.

- <u>Contributions to the Social Insurance Agency: VŠM</u> processes your personal data within the scope of common personal data, in order to comply with the legal obligations of VŠM required by Act no. 461/2003 Coll. on social insurance, as amended, Act no. 43/2004 Coll. on old-age pension savings, as amended, Act no. 650/2004 Coll. on supplementary pension savings and on amendments to certain acts, as amended. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) GDPR.

#### To whom will my personal data be disclosed?

Your personal data will be processed and stored for the period resulting from the registry plan of the VŠM resp. from the Act on Archives.

#### How long will my personal data be stored?

Your personal data will be processed and stored for 10 years.

<u>Health insurance contributions: VŠM processes your personal data</u> within the scope of common personal data, in order to fulfill the legal obligations of VŠM arising from Act no. 580/2004 Coll. on health insurance, on amendments to Act no. 95/2002 Coll. on insurance and on amendments to certain acts, as amended. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) GDPR.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to the health insurance company where the employee is insured.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period resulting from the registry plan of the VŠM resp. from the Act on Archives.

- <u>Payment of income tax advances and filing of tax returns: VŠM processes your personal data</u> within the scope of ordinary personal data, in order to comply with the legal obligation of VŠM imposed on it by Act No. 595/2003 Coll. on Income Tax and Act No. 563/2009 Coll. on Tax Administration (Tax Code) and on Amendments to Certain Acts, as amended. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) GDPR.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to the relevant tax administrator, which is the tax authorities.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the period resulting from the registry plan of the VŠM resp. from the Act on Archives.

<u>publishing data</u> on the <u>VŠM website</u>: VŠM may publish your personal data in the scope of name, surname, email, area of operation and photo on its website for the purpose of presenting the VŠM to the\_public and in order to enable internal and external communication. For this purpose, VŠM processes your photo based on your explicit consent, which is not necessary, but contributes to a better presentation of VŠM as an employer with whom you work under an employment contract. Other personal data in the scope of name, surname, email and area of activity are processed by VŠM on the basis of § 78 par. 3 of Act no. 18/2018 Coll. on the protection of personal data.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to InterWay, a.s., ID: 35 728 531, with its registered office at Stará Vajnorská 21, 831 04 Bratislava, which provides web hosting services to VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the duration of your employment relationship.

- <u>*Library:*</u> to which you provide your personal data in the scope of: name, surname, email, address, contact, borrowed title and date of borrowing. These personal data of yours as a borrower from the VŠM library are processed by VŠM for the purpose of fulfilling the contractual – borrowing – relationship.

#### How long will my personal data be stored?

Your personal data will be processed and stored for the duration of your membership in the library.

## I AM A VŠM SUPPLIER

Establishment of a contractual relationship and realization of rights and fulfillment of obligations arising from contracts with suppliers: VŠM processes personal data about contact persons of suppliers, to the extent of name, surname, telephone contact, email, and all to the extent necessary to ensure the relevant contractual relationship and the realization of rights and fulfillment of obligations under the relevant contracts. This is the legal basis for the processing of personal data pursuant to Article 6(1)(f) GDPR. The processing of these personal data is necessary for the purposes of the legitimate interest pursued by the VŠM in the proper fulfillment of rights and obligations arising from contracts.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to EKO DOM Partner s.r.o., with its registered office at Panská 4, 811 01 Bratislava, which provides accounting for VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for 10 years from the termination of the contract.

<u>Bookkeeping</u>: VŠM processes personal data on natural persons – suppliers or members of statutory bodies to the extent of personal data stated on invoices. This is the legal basis for the processing of personal data pursuant to Article 6(1)(c) of the GDPR, i.e. the fulfillment of the legal obligation of the VŠM arising from the Accounting Act.

#### To whom will my personal data be disclosed?

Personal data to the above extent will be provided to authorized persons of VŠM (secretary) and EKO DOM Partner s.r.o., with its registered office at Panská 4, 811 01 Bratislava, which provides accounting for VŠM.

#### How long will my personal data be stored?

Your personal data will be processed and stored for 10 years from the termination of the contract.

#### ARCHIVING

In accordance with Article 89 of the GDPR, VŠM processes personal data contained in archived documents in the public interest, for scientific or historical research purposes or for statistical purposes. In doing so, the GOM takes care to maintain the principle of minimizing personal data and, where possible, pseudonymization.

VŠM is further authorized pursuant to § 78 par. 1 of Act no. 18/2018 Coll. on the protection of personal data to process personal data without the consent of the data subject, if it is necessary for an academic purpose. However, such processing cannot interfere with your rights to protection of personality or privacy.

#### HOW LONG WILL PERSONAL DATA BE STORED?

Personal data contained in archival documents will be processed and stored for the period resulting from the VŠM registry plan or from the Act on Archives.

## MARKETING ANALYTICS

VŠM uses marketing analytics, on the basis of which it generally analyzes the behavior of website visitors, especially for better setting of individual targeted advertising (advertising studies at VŠM and/or CityU) and other marketing strategies. However, this specific purpose of processing does not necessarily entail the processing of personal data. If your personal data is processed in marketing analytics, the legal basis for processing is the legitimate interest of VŠM, which is to better understand website visitors when providing or offering studies.

## COOKIES

Cookies are small text files that are stored on your computer or mobile device while browsing a website and that improve your experience of the website. Individual cookies have different storage periods on your device. Some cookies are deleted from your device after you close your browser window (session cookies), others remain stored on your device even after you finish browsing our website (permanent cookies).

Cookies help us operate our website, provide important functions and ensure the functionality of our website. At the same time, cookies help us understand what interests you on our website, whether it is sufficiently clear for you and whether you can find what you are looking for on it. Cookies may also record other statistical information, such as the number of visitors to our website and also which subpages of our website you visit most often. They are also used to show you advertising that we believe is most relevant to your interests and needs.

## WHAT COOKIES DO WE USE?

- (i) essential cookies are necessary to use the basic functions of our website;
- (ii) operational cookies these cookies are used to analyze the visitor's behavior on the website and subsequently to improve its functionality and appearance; without these cookies, our website would not function properly and their use is therefore necessary;
- (iii) analytical cookies these cookies do not identify you individually (until you enter identification data in any form on our website), but help us tailor the content of our website to make it as userfriendly as possible for you, and
- (iv) Third-party cookies these cookies help us ensure that advertisements are more relevant to visitors to our website and are not under our control. If you want to know how these third parties (e.g. Google, Facebook) use cookies, please read the privacy and cookie policies of these entities below.

#### HOW TO CONTROL COOKIES?

If you want to prevent the installation of new cookies or if you want to delete existing cookies, please follow the instructions at the links below according to your browser type.

Internet Explorer	http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies
Firefox	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website- preferences, https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites- stored
Google Chrome	https://support.google.com/chrome/answer/95647?hl=en
Safari	http://help.apple.com/safari/mac/8.0/#/sfri11471

## MODIFICATION OF THE PRIVACY POLICY

We may change the Privacy Policy from time to time by posting a newer version of the Privacy Policy on our website and the date it takes effect. If we change this policy in a material way, we will inform you of this change by a general notice on our website or a separate notice by email.