

## Personal Data Privacy Statement of the Open University of Cyprus

(This Privacy Policy has been updated on 02/03/2026)

### 1. Introduction

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Keeping the confidentiality of your personal data is of high importance to the Open University of Cyprus (hereafter referred to as “OUC” or “the University”). For this reason, we have developed a Privacy Policy that governs the way we collect, use, share, transmit and store your personal data. Please read our privacy practices carefully and do not hesitate to contact us should any questions arise.

Personal data is considered any information concerning a natural person, whose identity can be ascertained directly or indirectly, in particular by reference to an identifying element, such as name, identity number, or one or more factors that characterize the physical, physiological, genetic, psychological, economic, cultural or social identity of the natural person in question. The term personal data includes sensitive data or special category data such as, for example, data concerning the health of a natural person, any criminal convictions and data revealing his race or nationality.

The OUC is committed to protecting the privacy and handling the personal data of its students and alumni in an open and transparent manner. The University is also committed to the collection and processing of the aforementioned data in full compliance with the General Regulation on the Protection of Personal Data of the European Union (Regulation 2016/679 – hereafter referred to as "the Regulation") and the legislation in force in Cyprus that governs the collection and processing of Personal Data of Individuals. This Privacy Policy provides information about the collection, use, disclosure, transfer and storage of personal information.

### 2. OUC's Role Under the Regulation

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Under the Regulation, the OUC acts as a Data Controller for all personal data that it collects and processes for its own processing activities. As a Data Controller, it collects, retains, and processes personal data of prospective and current students, prospective and current employees, visitors, and collaborators. In cases where ΑΠΚΥ acts as a Data Processor, it processes personal data in accordance with the means and purposes defined by the respective Data Controller.

### 3. How are Personal Data Collected

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Personal data is mainly collected directly from you, when you interact with us, either to fill in an application or for other requests. Please note that throughout your employment or studies at the OUC, we may collect additional personal data from activities related to your attendance in the following ways:

1. Through the use of the website or of the Portal or of the e-Learning Platform of OUC and through other online processes or other ways of contacting the University. This includes, where applicable, the use of dedicated online proctoring software during remote examinations, through which certain data such as image, audio, screen activity and technical connection data may be processed strictly for the purpose of ensuring academic integrity.
2. By correspondence and/or by electronic mail.
3. By completing any survey, that might concern the improvement of services, to which a student or an alumnus may participate.
4. Through participation in any kind of event organised by OUC.

### 4. Purposes of processing Personal Data

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Processing of your personal data is in accordance with the Regulation and the Cypriot legislation governing the collection and processing of Personal Data. The OUC uses the personal data for a number of purposes as part of its operations, as following:

1. To execute your contract of employment, if you work at the OUC, or your enrollment and studies if you are a student.
2. To comply with the University's legal obligations.
3. In order to protect your legitimate interests or the legitimate interests of the OUC.
4. When it is necessary for reasons of public interest.
5. With your consent.

### 5. Types of Personal Data Collected

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We collect and use various types of data, including data that lead to the identification of natural persons (hereinafter referred to as "data subjects who can be directly or indirectly identified"). The personal data that we collect and process may relate to:

#### (a) Visitors:

- Contact details (telephone number, email address, etc.).
- Images captured by the closed-circuit television (CCTV) system operating on our premises.

#### (b) Staff – prospective and current employees and/or collaborators:

- Basic information such as full name, address, and date of birth.

- Contact details (telephone number, email address, etc.).
- Curriculum vitae (CVs) and cover letters.
- Identity Card number, Social Insurance number, bank account number, and other financial information.
- Images captured by the closed-circuit television (CCTV) system operating on our premises.

**(c) Prospective and current students:**

- Basic information such as full name, address, and date of birth.
- Contact details (telephone number, email address, etc.).
- Academic information.
- Any other information relating to your studies.
- In the context of remotely proctored examinations, additional data may be processed, including image and audio data, screen activity, keyboard and mouse activity (without capturing the content typed), copy/paste actions, websites visited during the examination session, IP address, internet service provider and operating system information, presentation of an identification document for verification purposes, and the recording of potential violations of examination rules.

## **6. Processing of Sensitive Personal Data**

The OUC collects and processes special categories of personal data either on the basis of the explicit consent of students, prospective employees, employees, and alumni, depending on the scope and nature of the processing of such sensitive personal data, or where such processing is necessary for one or more of the following purposes: compliance with social security obligations; protection of the vital interests of a student or another member of the University community; the establishment, exercise, or defence of legal claims; reasons of substantial public interest; or reasons of public health, such as protection against cross-border threats to health, medical or healthcare purposes, or the assessment of fitness for work on health-related grounds; archiving purposes in the public interest; scientific or historical research purposes; statistical purposes; or where the data have been manifestly made public by the data subject.

Any processing of such data shall be proportionate to the purpose pursued and shall be carried out in accordance with the services provided by the University.

Where such data are used for monitoring and reporting purposes, they shall be anonymised wherever possible. The processing of such information may also take place in the context of lawful academic and university activities, subject to the implementation of appropriate safeguards.

## **7. Transfer of Personal Data**

Transfer of personal data to third parties may occur if it is required by law or requested by government authorities (e.g. the Statistical Office), or when it is necessary to manage our relationship with you or for the purposes of the OUC's legitimate interests. A transfer

or access to personal data may also occur by any natural or legal person that works or provides services to the University or acts on behalf of the University (either within or outside Cyprus) for any reasonable purpose in order to obey by the OUC's obligations or exercise the University's rights or the needs to carry out the University's functions and services offered to its students. In any case, all reasonable technical and organisational security measures will be adhered to in order to preserve all Personal Data.

## **8. Retention period**

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Personal data that have been or will be submitted by you to the University are kept in electronic and/or hardcopy form in one or more files on servers, in a secure storage space on the University's premises in Nicosia and Limassol. The maintenance and processing of the data subject personal data starts from the date of your registration/application/visit/business contact and continuous for as long as you choose or is necessary for the accomplishment of the purposes for which they were collected, including for the fulfillment of any legal, accounting or other requirements.

Specifically, personal data collected in the context of remotely proctored examinations are retained for a period of six (6) months from the date of the examination and are securely deleted thereafter, unless their continued retention is required for the establishment, exercise or defence of legal claims.

For more details regarding the retention period of personal data of a specific data process, please contact us at [dpo@ouc.ac.cy](mailto:dpo@ouc.ac.cy) or via telephone number 22550088.

## **9. Security**

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The OUC has implemented the appropriate technical and organisational measures, such as data-protection principles, in order to safeguard all personal information from unlawful use, intervention, modification or disclosure under the requirements of the Regulation.

## **10. Right to Object and Automated Individual Decision-Making (including Profiling)**

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OUC does not carry out processing based solely on automated decision-making, including profiling, that produces legal effects or similarly significant effects on individuals. In the context of remotely proctored examinations, the software used may flag or record potential violations of examination rules; however, any such cases are subject to review and assessment by the competent academic bodies of the University.

## **11. Data Protection Rights within the EU**

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According to the Regulation, you have the following rights in regards to your personal data (please note that these rights are not absolute and in some cases they are subjected to conditions as defined by the law and/or the Regulation):

1. **Right of Access:** You have the right to access your own personal data through the platform, as well as the right to request a copy of your personal data that is maintained and processed by the University.
2. **Right of Rectification:** You have the right to request the correction of any incomplete and/or inaccurate personal data we hold for you.
3. **Right to Erasure:** You have the right to request the deletion of personal data only if one of the following reasons is true:
  - (i) Personal data are no longer necessary in relation to the purposes for which they were collected or processed.
  - (ii) If the processing is based on your consent and you have withdrawn this consent (on which processing is based) in accordance with Articles 6.1.a and 9.2.a of the Regulation and if no other legal basis for processing applies.
  - (iii) If you object to processing in accordance with Article 21.1 of the Regulation and there are no compelling and legitimate reasons for processing.
  - (iv) If the personal data have been processed illegally.
  - (v) If the personal data should be deleted in compliance with a legal obligation under the European Union's law to which the University is subject to.
  - (vi) If the personal data have been collected in relation to the provision referred to in Article 8.1 of the Regulation.
4. **Right to Object:** You have the right to oppose the processing of your personal data at any time and for reasons related to a specific situation, unless there are compelling legitimate reasons for processing that overrides your interests, rights and freedoms.
5. **Right to Restriction of Processing:** You reserve the right to request the restriction of processing on your personal data so that we may no longer process the specific information until the restriction is lifted (for example, the data have been corrected).
6. **Right to Data Portability:** You have the right to request the transfer of your personal data that you have provided to the University. These data will be given to you in a format that is structured, widely used and machine readable and, in certain cases, you may also have the right to request for us to send the information to another organization, provided that such a transfer is technically feasible.
7. **Right to Withdraw Consent:** In the case in which you may have given your consent for the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw it at any time.

If you have any questions in regards to the kind of personal data we hold for you, or if you want to request the deletion or correction of your personal data, or you want to exercise any of your personal data rights, please send a request to the email [dpo@ouc.ac.cy](mailto:dpo@ouc.ac.cy) or call via the following telephone number 22550088.

## **12. Changes to the Personal Data Privacy Statement**

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We reserve the right to modify or amend this Policy at any time by publishing the revised policy on the University's Website <https://www.ouc.ac.cy/index.php/en/terms-policy>. It is recommended that you periodically check this Policy for any changes that may occur in order to be informed in regards to the way the University uses and safeguards your Personal Data.

## **13. Contact info**

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If you have questions in regards to our Personal Data Privacy Statement or the use of your personal data, as described above, or you want to exercise any of your rights, please contact OUC's Data Protection Officer, Mr. Therapon Therapontos via email address [dpo@ouc.ac.cy](mailto:dpo@ouc.ac.cy) or via telephone number 22550088.

## **14. Submission of Complain**

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If you feel that your concerns in regard to the use of your personal data or any of your data protection rights have not been address by us, you have the right to contact the Personal Data Protection Commissioner's Office, via the following link: [https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home\\_el/home\\_el?opendocument](https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_el/home_el?opendocument)