

Personal Data Privacy Statement of the Open University of Cyprus

(This Privacy Policy has been updated on 17/07/2023)

1. Introduction

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

Under the Regulation, the OUC is the *Data Controller* for all the personal data it maintains and processes, except in cases where the University is the *Data Processor* on behalf of another *Data Controller*. As a *Data Controller*, the OUC is allowed to collect maintain and process prospect or current students', prospect or current employees'/collaborators' and business associates', visitors', alumni's personal data.

3. How are Personal Data Collected

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.
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

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

The OUC may collect a range of personal data depending on the relationship between the University and the Data Subject.

If you are a prospect or current student the personal data collected and used by the OUC include your full name, identity card number, student ID number, course title, grades/examination results, date of birth, telephone number, email, address and province.

If you are an alumnae member of our University, we will maintain your personal email address to inform you of any news relating to the University and any upcoming events.

If you are a prospect or current employee or collaborator, we collect personal data including full name, identity card number, social status, education and training records, past employment information, financial and/or banking information, employee identification number, Curriculum Vitae, gender, title, date of birth, telephone number,

email, address and province, days of sick leave and information relating to medical insurance, if applicable.

If you are a business associate (supplier, subcontractor, etc) we maintain the necessary personal data required to execute the contract or business transaction between us, such as contact details.

If you are a visitor, we will be asking you to provide us with information including your full name, the purpose of your visit and the name of the person you are visiting. You will also be asked to sign in and out of the premises by completing your information in our logbook.

Furthermore, the OUC is entitled to collect, maintain and process student's and employee's personal data that belong to special categories of data, also known as 'Sensitive Data', which include data on racial or ethnic origin, religious or philosophical beliefs, biometric data, and physical or mental health solely to provide a safe and fair environment for them to study or work.

6. Processing of Sensitive Personal Data

The OUC collects and processes special categories of personal data under the legal basis of contract execution or of the expressed consent of students, employees and alumnae, depending on the scope of the processing the specific sensitive personal data. The purposes of processing these data are: to facilitate student study due to social security requirements, to protect the vital interests of the student or other member of the University, for the purpose of pursuing or supporting legal claims, for reasons of substantial public interest or for reasons of public health (such as protection against cross-border health threats), for medical/healthcare purposes, for purposes of storing due to public interest, or where the information is widely disclosed by the student or alumni. Any processing will be proportional to the purpose and will be in accordance with the services provided by the University. When these data are used for monitoring and reporting purposes, the data will be anonymous where possible. It is also possible to process such information in the course of legitimate academic and University activities, with the 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

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

9. Security

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)

None of the OUC's data processing rely on automated decision-making and/or profiling.

11. Data Protection Rights within the EU

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 or call via the following telephone number 22550088.

12. Changes to the Personal Data Privacy Statement

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

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 or via telephone number 22550088.

14. Submission of Complain

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