



RIGA MANAGEMENT COLLEGE

SIA "Rīgas Menedžmenta Koledža", Reg.Nr. 50203022521, education institution reg.. Nr.3347802535,
Lomonosova Str. 1, bldg.4, Riga, LV-1019, phone [28007735](tel:28007735), email: info@managementcollege.eu, www.mcollege.eu

CONFIRMED

At the council meeting on 30.10.2018.

Protocol No. 5

with amendments

at the Council meeting on 02.11.2023.

Protocol no. 1-1.5/2023/04

No. 1-4/2023/23b

Privacy Policy

1. SCOPE OF THE PRIVACY POLICY

1.1. The limited liability company "Rīgas Management College" (hereinafter referred to as the College), registration no. 50203022521, the privacy policy defines the procedure by which the College processes personal data to ensure the interests and freedoms of the data subject, fair and legal processing of personal data.

1.2. This Policy is applicable if a physically identifiable person (hereinafter – the Data Subject) has used, is using, or has expressed a desire to use the services provided by the College, or is otherwise associated with the services provided by the College, including the relationship with the Data Subject established before this policy entry into force.

2. OFFICER OF PERSONAL DATA PROCESSING

2.1. Personal data processing manager – College, registration no. 50203022521, legal address: Lomonosova iela 1 k-4, Riga, LV-1019; place of study program implementation – Lomonosova street 4, Riga, LV-1003, telephone - +371 28007735.

2.2. A request for exercising your rights can be submitted in accordance with Section 11 of the Privacy Policy.

3. GENERAL TERMS

3.1. The purpose of the privacy policy is to provide information – to the data subject about the purpose of personal data processing, the legal basis, scope of processing, protection and other actions with data that are carried out during the processing of personal data. Detailed information on the processing of personal data can be specified in contracts and internal regulations of the College.

3.2. The College fully complies with applicable laws and regulations when processing personal data of Data Subjects:

3.2.1. 27.04.2016 of the European Parliament and the Council. Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data and which repeals Directive 95/46/EC (hereinafter - the Regulation) and

3.2.2. The Law "Law on Data Processing of Individuals" adopted by the Saeima of the Republic of Latvia and promulgated by the President of the Republic of Latvia and other normative acts regulating data protection.

3.3. The college ensures the confidentiality of personal data and implements appropriate technical and organizational measures to protect personal data from unauthorized access, illegal processing or disclosure, accidental loss, alteration or destruction.

4. SCOPE OF THE PRIVACY POLICY

4.1. Personal data is any information about an identified or identifiable natural person, as well as data that can be used to identify a specific person. Categories of personal data are specified in this section.

- 4.2. The College's Privacy Policy applies to privacy and personal data protection in relation to:
- 4.2.1. for natural persons – academic staff, guest lecturers, general staff, students, graduates, website visitors, users of any College services (including potential, former and existing), as well as third parties who, in connection with the provision of services to a natural person, receive or transfer any of the College's information that can be linked and also defined as the subject's personal data (contact persons, payers, etc.);
 - 4.2.2. For users of the website maintained by the college (hereinafter – Data subject).
- 4.3. The College takes care of the Data Subject's privacy and personal data protection, respects the Data Subject's right to the legality of personal data processing in accordance with the applicable laws - the Law on the Processing of Personal Data, the EU Regulation and other applicable laws in the field of privacy and data processing.
- 4.4. The Privacy Policy applies to data processing, regardless of the form and environment in which the Data Subject provides personal data (on the College's website, mobile apps, in paper format, by telephone or by sending information electronically) and in which systems it is processed.
- 4.5. With regard to specific types of data processing (for example, cookie processing, etc.), environment or purposes, additional, specific rules may be established, of which the Data Subject is informed at the time he provides the relevant data to the College.

5. PURPOSES AND LEGAL BASIS OF PERSONAL DATA PROCESSING

- 5.1. The College processes the personal data of the Data Subject based on the following legal bases:
- 5.1.1. for the conclusion and execution of the contract – to conclude the contract at the request of the Data Subject and ensure its execution;
 - 5.1.2. for the execution of regulatory enactments – to fulfill the obligations set forth in the external regulatory enactments binding on the College;
 - 5.1.3. in accordance with the wishes and activities of the Data Subject, for example, filling out application forms for certain purposes (for free study of study materials);
 - 5.1.4. in accordance with the consent of the Data Subject;
 - 5.1.5. in legal (legitimate) interests – to realize the legitimate interests of the College arising from the obligations existing between the College and the Data Subject or the concluded contract or the law.
- 5.2. Legitimate (legitimate) interests of the College:
- 5.2.1. to provide an opportunity to obtain short-cycle professional higher education for all interested parties, using the electronic environment and in person;
 - 5.2.2. to carry out commercial activities in the field of providing education;
 - 5.2.3. verify the identity of the Data Subject before concluding the contract;
 - 5.2.4. to ensure the fulfillment of contractual obligations;
 - 5.2.5. to save the Data Subject's applications and submissions for the provision of services, other applications and submissions, notes about them, including those made orally, when calling the College, providing written information in electronic or paper format and on websites;
 - 5.2.6. analyze the operation of the College's website, websites and mobile applications, develop and implement their improvements;

- 5.2.7. perform actions to retain the Data Subject;
 - 5.2.8. promote College services by sending commercial communications;
 - 5.2.9. send other reports on the progress of contract execution and events relevant to contract execution, as well as conduct surveys of the Data Subject on the quality of the services provided, in order to promote the introduction of new and prospective innovations;
 - 5.2.10. provide financial and business accounting and analysis;
 - 5.2.11. ensure and improve the quality of services;
 - 5.2.12. administer payments;
 - 5.2.13. administer outstanding payments;
 - 5.2.14. apply to state administration, operational institutions and courts for the protection of their legal interests;
 - 5.2.15. to inform the public about their activities.
- 5.3. For the provision of information to state administrative institutions and subjects of operational activity in accordance with the requirements of the laws and regulations of the Republic of Latvia, and for other specific purposes, about which the Data Subject is informed at the time when he provides certain data to the College.

6. PERSONAL DATA PROCESSING

- 6.1. The College processes the Data Subject's data taking into account the existing privacy risks and the organizational, financial and technical resources available to the College.
- 6.2. In order to qualitatively and promptly ensure the fulfillment of the obligations of the agreement concluded with the Data Subject, the College may authorize its business partners, who operate on the basis of a cooperation agreement, to perform individual service provision activities. If, while performing these tasks, the College's cooperation partners process the personal data of the Data Subject at the College's disposal, the relevant College cooperation partners are considered the College's data processing operators (processors) and the College has the right to transfer the necessary Data Subject's personal data to the cooperation partners to the extent necessary for this for performing actions.
- 6.5. The College's cooperation partners (in the capacity of personal data processor) will ensure the fulfillment of personal data processing and protection requirements in accordance with the College's requirements and legal acts, and will not use personal data for purposes other than the agreement concluded with the Data Subject or the request sent (in paper form, by telephone or electronically) for the fulfillment of obligations in the task of the College.

7. PROTECTION OF PERSONAL DATA

- 7.1. The College protects the Data Subject's data, taking into account existing privacy risks and the organizational, financial and technical resources available to the College, including using the following security measures:
- 7.1.1. Data encryption when transmitting data (SSL encryption);
 - 7.1.2. Intrusion protection and detection programs;
 - 7.1.3. Other protective measures according to the current possibilities of technical development.

8. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

8.1. The College does not disclose to third parties the personal data of the Data Subject or any information obtained during the provision of services and during the term of the contract, including information about received electronic communications, content or other services, except for:

8.1.1. if data must be transferred to the relevant third party within the framework of the concluded contract in order to perform a function necessary for the performance of the contract or delegated by law (for example, to a bank within the framework of settlements or to provide another service, about which the Data Subject is informed in the relevant contract);

8.1.2. in accordance with the Data Subject's consent;

8.1.3. to the persons provided for in external regulatory enactments, upon their justified request, in accordance with the procedures specified in internal and external regulatory enactments;

8.1.4. in cases determined by external regulatory acts, for the protection of the legitimate interests of the College, for example, by applying to the court or other state institutions against a person who has violated the legitimate interests of the College.

9. DURATION OF PERSONAL DATA STORAGE

9.1. The College stores and processes the personal data of the Data Subject as long as at least one of the following criteria exists:

9.1.1. Within the term of the contract concluded between the College and the Data Subject;

9.1.2. until the service applied for by the Data Subject to the College using website tools, telephone, electronic mail or paper submission will not be provided;

9.1.3. as long as the College or the Data Subject can realize their legitimate interests (for example, submit objections or file or bring a lawsuit in court) in accordance with the procedures set forth in internal and external regulatory acts;

9.1.4. as long as one of the parties has a legal obligation to store the data;

9.1.5. while the Data subject's consent to the relevant personal data processing is valid, if there is no other legal basis for data processing.

9.2. After this section 9.1. the circumstances referred to in paragraph 1 end, the personal data of the Data Subject are deleted.

10. ACCESS TO PERSONAL DATA AND OTHER RIGHTS OF THE DATA SUBJECT

10.1. The data subject has the right to receive the information specified in the regulatory acts in connection with the processing of his data.

10.2. The data subject, in accordance with the laws and regulations, also has the right to request the College to access his personal data, as well as to request the College to supplement, correct or delete it, or limit the processing in relation to the Data subject, or the right to object to the processing (including the processing of personal data carried out based on the legal (legitimate) interests of the College, as well as the right to data portability. These rights are enforceable to the extent that the data processing does not result from the College's obligations imposed on it by the current regulatory enactments and which are carried out in the public interest.

10.3. The data subject can submit a request for the exercise of his rights:

10.3.1. in written form in person at the place of implementation of the College's study programs (Lomonsova iela 4, Rīga, LV-1003), presenting an identity document;

10.3.2. in the form of electronic mail, signing with a secure electronic signature.

10.4. The College, upon receiving a request from a Data Subject for the exercise of its rights, verifies the identity of the Data Subject, evaluates the request and fulfills it in accordance with regulatory enactments.

10.5. The College sends the answer to the Data Subject by mail to the contact address indicated by him, in a registered letter or electronically, taking into account the method of receiving the answer indicated by the Data Subject, as far as possible.

10.6. The College ensures the fulfillment of data processing and protection requirements in accordance with regulatory enactments and, in the event of objections from the Data Subject, takes appropriate actions to resolve the objection.

10.7. In case of claims, the Data Subject has the right to apply to the supervisory authority – the Data State Inspectorate.

11. DATA SUBJECT'S CONSENT TO DATA PROCESSING AND THE RIGHT TO WITHDRAW IT

11.1. The data subject has the right to withdraw the consent given to data processing at any time by writing to the College's e-mail: info@managementcollege.eu or by calling +371 28007735, in which case further data processing based on the previously given consent for the specific purpose will no longer be performed.

11.2. Withdrawal of consent does not affect data processing carried out at the time when the Data Subject's consent was valid.

11.3. Withdrawal of consent cannot stop data processing carried out on the basis of other legal grounds.

12. COMMUNICATION WITH THE DATA SUBJECT

12.1. The College communicates with the Data Subject using the contact information provided by the Data Subject (phone number, e-mail address, postal address), using the College's websites or apps.

12.2. The College communicates about the fulfillment of contractual obligations for services on the basis of the concluded contract (for example, coordination of services, information about contractual obligations and invoices, about planned works, changes in services, etc.).

13. OTHER RULES

15.1. The College has the right to make additions to the Privacy Policy, making its current version available to the Data Subject in his user profile, as well as by posting it on the College's website.

15.2. The College maintains the previous editions of the Privacy Policy and they are available on the College's website.