



Natolin

Privacy Notice for Students

Purpose of this notice

The College of Europe in Natolin, headquartered in Warsaw at 84 Nowoursynowska Street, 02-797 Warsaw, KRS: 0000148214, ("We", "us", "our", "College") is committed to protecting your privacy.

"You" and "your" refer to those who express an interest in becoming a student at the College (both prior to and at the formal application stage) and those who later become registered students at the College.

This notice explains how we will collect and use your personal data under the GDPR.

Where does the College get your personal data from?

We obtain personal data about you from the following sources:

- from you when you show the intention to become a student with us or register as a student;
- from you when you register at specific applicant recruitment activities such as academic fairs;
- from you when you participate in an online remote oral exam using web conferencing;
- from you if necessary for reasons of public interest in the area of public health;
- from third-party sources including, for example: other institutions involved in joint programs; funding and sponsorship partners; educational institutions, examination boards; government departments employers who may provide a reference about you or sponsor your studies. When we obtain personal data about you from third-party sources, we will look to ensure that the third party has the lawful authority to provide us with your personal data;
- during events managed by the College where photographs, audio and video recordings of you may be taken.

Categories of personal data being processed

We will collect and process your personal data for the purposes described below. The types of information collected and processed by us may include, but are not limited to, the following:

- biographical and contact details such as name, student ID number, gender, address, date of birth, country of birth, telephone number, email, and citizenship;
- academic information and employment history, such as academic history, academic grades, relevant work experience, exam scripts, continuous assessments, and library information. We will also keep records relating to assessments of your work, details of examinations taken, qualifications, predicted and actual examination grades and other information in your student record;
- financial information such as bank details, details of funding and fees;
- any records relating to student policies and procedure cases, e.g., malpractice, disciplinary actions;
- visa and immigration information, including visa and passport details;



Natolin

- your student number and other examples of a unique system, e.g., C-Card and C-Account;
- information about your family or personal circumstances, and both academic and extracurricular interests, for example, where this is relevant to the assessment of your suitability to receive a bursary or to provide you with appropriate support.

The personal data that we process may in some specific cases contain “special categories of data” or “sensitive data” as described under the GDPR. Such “special categories of data” could include information about your diet, physical or mental health, racial or ethnic origin, religious beliefs or other beliefs.

In case of a public health emergency, we can also acquire additional data about your health and whereabouts. When you register with us as an applicant or student, you can share specific “special categories of data” with the College if necessary.

The purposes for which we process your personal data and the legal basis for that processing

In general terms, we process your personal data for the administration of your position as an applicant or student with us, including the use of our services, such as residential services, lecture capture, attendance monitoring, the library, digital services and all other services directly and indirectly necessary.

The various legal bases to process this data are necessary for the performance of the College’s obligations, legal obligations, legitimate interest, and consent in specific cases. Personal information is needed to provide you with the following services and to undertake the following activities:

- recruitment, application, admissions, and enrolment purposes, and to provide you with information about ICT (Information and Communication Technologies) and other support services;
- making and keeping student records on central systems, maintaining your student record and managing academic processes;
- educational, assessment and training purposes, including providing you with technology which assists you to undertake and manage your studies and evaluations and to record and reflect on your learning;
- support purposes, including the provision of advice and support to you, academic services, welfare, including counselling and pastoral services, educational support, support with your Immigration process, health and safety, attendance monitoring, vacancy information and careers guidance, where you need or choose to access these services;



Natolin

- managing College services including ICT services, library services and events;
- administering financial matters. This includes your liability for scholarships, fees, and payment of student fees;
- communication purposes including email, text messages and other electronic communications;
- undertaking enquiries and investigations about complaints, student conduct, fitness to study, academic appeals and any other enquiries and investigations in line with College policies;
- ensuring that our College community remains safe and inclusive, including the management of behavioural or disciplinary issues;
- contacting your emergency contacts;
- confirmation of awards;
- where you provide written consent, providing references to future employers or Further or Higher Education Institutes;
- statistical and archival purposes.

Who might we share your data with?

To perform our legal responsibilities, contractual and other purposes set out above, the College will occasionally share your personal data with third parties; these may include, but are not limited to the following:

- specific government bodies;
- specific selection committees;
- third parties involved in the delivery of your course (such as but not limited to a guest lecturer);
- accrediting and professional bodies;
- your funders, sponsors and grant funding bodies;
- other educational institutions with which the University partners to provide our teaching and educational services to you, to deliver placements, and to offer joint or dual, and franchised or validated awards;
- external examiners for the purpose of assessment;



Natolin

- agents assisting the College with international admissions (limited to what is strictly necessary for the performance of the agent's role) - this may include the disclosure of personal data outside the European Economic Area;
- public authorities, e.g., in field of the investigation of crime, national security, immigration, tax and benefit matters;
- alumni associations;
- printing, mailing and marketing agencies who assist us, under contract, to communicate with you;
- your trusted / emergency contact and the emergency services regarding emergencies, e.g., where your physical or mental health or wellbeing, or safety is at risk;
- potential employers and other educational institutions requesting a reference for a current or past student. This includes confirmation of awards;
- our ICT providers supplying, supporting and hosting our ICT services, and other data processors acting on behalf of the College;
- local authorities in relation to council tax exemption, administration of housing benefit and processing care leaver bursaries;
- our banking and online payment processing service suppliers;
- suppliers offering plagiarism checking services and other academic institutions to identify instances of collusion about plagiarism misconduct;
- third parties wishing to access a catalogue within the College library containing references to student work.

Additional notices and guidance/policies

We also have some additional notices, guidelines and policies with further helpful information about the way we process your personal data:

- the College's policies and procedures relative to protecting personal data;
- attendance monitoring – we conduct attendance monitoring for a number of reasons, including to assist students who need a visa and to ensure the proper engagement of our students;
- lecture capture or streaming services – we record educational and comparable activities in which you may be involved from time to time. We do not permit students to record educational activities without prior written approval;



Natolin

- pictures can be taken specifically during courses and events on the College premises in general. These pictures will be stored on College systems and can be used for publication in brochures, adverts, and similar materials on paper and the web. We can process personal data for this purpose without explicit permission if the person constitutes only a detail of a whole, such as a meeting, a landscape, or a public event (Polish Act of 4 February 1994 on copyright and related rights);
- our website uses cookies (which collect your personal data). Please see our policy on the use of Cookies at www.coleurope.eu/privacy-policy-web.

Transfers to third-party countries

Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organizations based within the European Economic Area (EEA) or, if outside the EEA, based in countries that have adequate levels of protection.

When it is necessary to share your data with organizations outside the EEA, we will ensure that appropriate safeguards are in place.

Retention periods

The College uses different retention guidelines depending on the type of data. In general, the data will be processed no longer than necessary.

You can contact the College's Privacy Office for more detailed information.

Legal bases for processing your data under GDPR

We will process your data under the GDPR that we consider the legal basis for processing personal data.

- (Article 6(1)(a)), on specific occasions the College will only process certain data if you give your consent, e.g., on registration you only need to provide specific "special categories" of data if you agree with that.
- (Article 6 (1)(b)), processing is necessary for the performance of the College's obligations. On many occasions, the College will process your data to enable it to meet its commitments to you, e.g., teaching and assessment.
- (Article 6 (1)(c)), processing is necessary to comply with a legal obligation. The College has legal obligations to provide your personal data to others (e.g., the City of Warsaw concerning your residence permit).
- (Article 6 (1)(d)), to protect your or another's vital interests. Sometimes and only in extreme circumstances the College will have to release information to protect your interests or the interests of others, e.g., in medical emergencies.



Natolin

- (Article 6 (1)(e)), processing is necessary for the performance of a task carried out in the public interest. The College is an educational establishment; in particular, its educational activity is conducted in the public interest (including your interest and the interest of others).
- (Article 6 (1)(f)), processing is necessary for the legitimate interest of the College or a third party subject to overridden interests of the data subject. The College (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be its Alumni activities or ensuring safety at the College of Europe. We will take photos of our students and place them on the identifiers. We will use these photos only to confirm our identity. Where Article 6(1)(f) is used the "legitimate interest" is generally the interest of the College (or third party) in providing or supporting the provision of higher education to its students.
- (Article 22(2)(a)), automated decision making is necessary for the performance of a contract. The College will sometimes automate decisions relating to the services it provides to you.
- (Article 9(2)(a)), processing "special categories" of data where you have given consent. The College will process certain sensitive information about you with your consent.
- (Article 9(2)(g)), processing "special categories" of data where necessary for reasons of substantial public interest.
- (Article 9(2)(f)), processing "special categories" of data in connection with legal claims. It is recognised that some of the above grounds will overlap and that the College could rely on multiple grounds justifying its lawful processing. The College also reserves the right to rely upon other grounds.
- (Article 9(2)(i)), processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and medicinal products or medical devices, based on Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

Your rights as an individual

Under the GDPR you have the right to:

- withdraw consent where that is the legal basis of our processing;
- access the personal data that we process;
- rectify inaccuracies in personal data that we hold about you;
- be forgotten, that is, your details will be removed from the systems we use to process your personal data unless there are legal grounds not to do so. If we erase the data, we have the right to keep information about the person at whose request we did it;



Natolin

- restrict the processing in specific ways. The data subject may request that we rectify their inaccurate personal data without undue delay or complete their incomplete data;
- obtain a copy of your data in a commonly used electronic form (data portability). We shall transmit the data directly to the customer or, additionally, to the controller designated by the data subject. We need to obtain an appropriate request in order to transmit the data of the data subject;
- object to our processing of your personal data based on our legitimate interest. You shall each time indicate to us to what specifically you are objecting;
- be aware that you shall indicate the data that will enable us to identify you. We provide answers in writing within the time limits set out in GDPR;
- contact the Privacy Office for further information;
- lodge a complaint against the College of Europe regarding data protection issues with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych - Prezes UODO);

For more information please see: <https://uodo.gov.pl/en>.

Concerns and contact details

If you have any concerns about the way your personal data is being processed or have a query about this Notice, please contact our Privacy Office.

- By e-mail: privacy_office.pl@coleurope.eu.
- By post: Privacy Office; College of Europe in Natolin; Nowoursynowska 84; 02-797 Warsaw; Poland.
- In person: after arranging an appointment.

The administrator (College of Europe in Natolin) has appointed a data protection officer to supervise the processing of personal data. You can contact the data protection officer by email at iodo.pl@coleurope.eu.

Changes to this notice

We are likely to make changes to this Notice. We shall inform you of any changes to this Notice. Notification will be through the appropriate medium of communication.