



NATIONAL EDUCATIONAL UNIVERSITY

Personal Data Protection Policy



Article 1. General Provisions

1.1. The purpose of the document is to protect the fundamental rights and freedoms of the “NEU - National Educational University” (hereinafter referred to as the “University”), including ensuring the inviolability of personal information and privacy;

1.2. The Personal Data Protection Policy establishes the strategy, mechanisms and tools for the protection of personal data at the University;

1.3. The document applies to academic, administrative, guest and support staff employed at the University, students, graduates and/or any other person exercising their authority on behalf of the University;

1.4. The legal document of the University complies with the Law of Georgia “On Personal Data Protection”, the current legislation of Georgia and the recommendations of the State Inspectorate in this area.

Article 2. Purpose of the document

2.1. To establish the rules and procedures for the protection and processing of personal data collected in the course of the University's activities;

2.2. To ensure that the processing process is conducted in accordance with the legislation, protect the rights of individuals and ensure transparency of processing.

Article 3. Definition of Terms

3.1. The terms used in the legal document are interpreted based on the specifics of the University's work and are in accordance with the Law of Georgia "On Personal Data Protection";

3.2. Personal data - information that is related to an identified or identifiable natural person. A natural person is identifiable when it is possible to identify him or her directly or indirectly, including by name, surname, identification number, geolocation data, identifying data of electronic communication, physical, physiological, mental, psychological, genetic, economic, cultural or social characteristics;

3.3. Special category data - data relating to a natural person's racial or ethnic origin, political opinions, religious, philosophical or other beliefs, trade union membership, health, sex life, status of the accused, convicted, acquitted or victim in criminal proceedings, conviction, sentencing, recognition as a victim of human trafficking or a crime in accordance with the Law of Georgia on Prevention of Violence against Women and/or Domestic Violence, Protection and Assistance to Victims of Violence, imprisonment and execution of a sentence, as well as biometric

and genetic data processed for the purpose of uniquely identifying a natural person;

3.4. Data subject - any natural person whose data is used by the University for university purposes;

3.5. Data processor - the university, which determines the purposes and mechanisms, methods, forms, data protection measures, as well as the ways of realizing the rights and obligations of the data subject;

3.6. Authorized person - a person, determined by law, internal legal acts and/or on the basis of an agreement, who processes data on behalf of the university based on these/its purposes. The university's authorized person for data processing on the basis of an agreement is LLC "Ini Group";

3.7. Data processing - any action performed on personal data, including their collection, retrieval, access to them, their photography, video and/or audio monitoring, organization, grouping, linking, storage, modification, consolidation, etc. Processing can be carried out in a fully automated form, semi-automatically or fully mechanically;

3.8. Third party - a third party is any natural or legal person, public institution, other than the data subject, the Personal Data Protection Service, the University and the authorized person;

3.9. Consent of the data subject - the active action of the data subject, after receiving the relevant information, in writing (including electronically) or orally, freely and clearly expressed will to process data about him for a specific purpose. Consent may be provided orally or in writing, including through appropriate electronic communication methods.

Article 4. Personal data at the University

4.1. Personal data is processed:

- by automated means;
- by semi-automated means;
- by non-automated means.

4.2. The following data is processed at the University:

A. Administrative/support staff - name, surname, personal number, photograph, date of birth, age, gender, copy of the identity document, series and number of the said document, period of its issuance, copy of driver's license, biography, information on education, information on the level of foreign language proficiency, copy of diploma, copy of documents confirming education/qualification, information on knowledge of computer programs, information on work experience, information on reporting to work, telephone number, e-mail address,

residential/registration address, bank details, information on military service, position held, information on remuneration, convictions, information on convictions for crimes against sexual freedom and inviolability, information on health status (Form 100);

B. Academic and visiting staff - name, surname, photograph, date of birth, age, citizenship, gender, registration/residence address, personal number, copy of identity document, series and number of identity document, date of issue of identity document, autobiography, resume (CV), information about education, information about foreign language proficiency, copy of diploma or certificate of education, information about knowledge of computer programs, information about work experience, hourly workload, information about reporting to work, telephone number, e-mail address, bank account number, position held (position), information about remuneration, profession and professional achievements, scientific publications, inventions, patents, person's workload at other universities;

C. Job candidate - name, surname, autobiography, resume (CV), copy of diploma or certificate of education, information about work experience, information about knowledge of a foreign language, information about knowledge of computer programs, phone number, e-mail address, residential/registration address;

d. Student - name, surname, personal number, series and number of the identity document, date of issue of the identity document, photograph, phone number, e-mail address, date of birth, knowledge of a foreign language, gender, information about education, citizenship, information about military service, copy of the student's study card or its extract, all legal acts/acts determining the student's status (enrollment order, suspension of status, restoration), copy of the order of the Ministry of Education, Science and Youth of Georgia on granting the right to study in accordance with the legislation, information confirming general education (certificate), information about participation in a social program;

e. University visitors - first name, last name.

4.3. The terms of storage of personal data are determined by the Order of the Minister of Justice of Georgia of March 31, 2010 N72 and in accordance with the legal regulations in force at the University;

4.4. Personal data is processed at the University in accordance with the law, is recorded in a file system, which indicates the purpose of processing, grounds and data storage terms;

4.5. Personal data, the grounds for processing of which are not prescribed by law, are processed only with the consent of the data subject;

4.6. The University processes and issues in the form of an order such personal data that are related to granting, terminating, suspending, restoring the status of a student to a person, as well as the appointment of financial benefits and scholarships to him. The University is authorized to publish an order for public information if this is determined by law;

- 4.7. The University, in the interests of students, processes special categories of data, such as data related to health, only upon the request of the data subject and with his/her consent;
- 4.8. The University has the right to process data for the purpose of preventing and detecting plagiarism;
- 4.9. The University is authorized to process personal data when taking disciplinary measures;
- 4.10. The University is authorized to re - process personal data for the purposes of career support for graduates. Conduct a study of graduate employment rates;
- 4.11. The University processes data of minors with the consent of the legal representative;
- 4.12. The University ensures continuous monitoring of personal data protection;
- 4.13. The University ensures that employees and students are informed about the processing of personal data through a contract and a data protection policy document.

Article 5. Processed data and their use

- 5.1. Management of personal files of employed persons, creation and organization of reserve bases for demanded positions, personnel assessment, implementation of offers to employed persons, execution of contracts, business trips, vacations and other documentation, personnel survey, organization of competitions for vacant positions;
- 5.2. Organization and control of document circulation, legal support of casework, development of regulatory acts, consideration of applications of individuals, provision of legal advice on issues related to the educational process, representation of the university in relations with courts and third parties;
- 5.3. Conducting assessments of educational, scientific, research work, as well as improving the professional development of personnel, assessment and quality control of student activities, planning and management of library activities;
- 5.4. Management of student study bases, electronic casework, effective communication with employed persons, academic and invited personnel;
- 5.5. Ensuring security and prevention on the territory of the university - improving the quality of services provided;

Data and their processing in online format

- 5.6. The university is authorized to use various electronic platforms (for example, Zoom, Teams, Moodle, Google Meet, etc.) for remote meetings, for which it provides access to a person's home computer from the office

computer or other communication using modern electronic programs.

Article 6. Subjects and person(s) responsible for processing personal data

6.1. Within the scope of their competence, the following have/may have access to personal data at the University:

- Rector;
- Senate;
- School of Business Administration and Social Sciences;
- School of Law;
- School of Health Care;
- Quality Management Service;
- Legal Support Service;
- Human Resources Management Service;
- Public Relations Service;
- Financial and Material Resources Service;
- Safety and Health Service;
- International Relations Service;
- Registry and Information Technology Service;
- Student/Graduate Assistance and Career Development Center;
- Examination Center;
- Scientific Research Center;
- Library.

6.2. The University has a designated person responsible for personal data processing - hereinafter referred to as the "Officer", which ensures the effective implementation of the requirements of the personal data protection legislation;

6.3. The Officer is independent in the performance of his/her duties and is directly accountable to the Rector of

the University for their performance. It is not permissible to create obstacles or interfere in the activities of the Officer in any way. The Officer is appointed to the University by the Rector.

Article 7. Student Database

7.1. The University has signed an agreement with the relevant service provider (authorized person) for the purpose of database administration, through which the service provider provides the University with the relevant electronic database system service;

7.2. The service provider at the University is LLC “Ini G”.

Article 8. Video Surveillance

8.1. Video surveillance is carried out on the outer perimeter of the University administrative building, at the entrance and in the corridors of the building;

8.2. The purpose of video surveillance is to ensure the safety of students and other persons, protect minors from harmful influences, protect property and/or protect confidential information;

8.3. Video surveillance at the University is additionally permitted only in the space designated for ensuring the examination process, which is a means of ensuring control and transparency of the examination center;

8.4. Warning signs about video surveillance conducted at the University are placed in appropriate visible places;

8.5. Records obtained as a result of video monitoring at the University are stored for 3 (three) working days;

8.6. Access to video monitoring at the University is available to the Security and Health Service and the Registry and Information Technology Service;

8.7. Audio monitoring is not carried out at the University - it is not allowed;

8.9. For the purpose of operational - search measures and criminal investigation, upon request, the University shall transfer video recordings to relevant agencies, only upon the decision of a judge, or in case of urgent necessity, on the basis of a motivated resolution of the prosecutor.

Article 9. Subject's authority

9.1. The subject is entitled to submit a request to the University and request information about data processing;

- 9.2.** The subject is entitled to receive information from the University about the processed information;
- 9.3.** The requested information must be provided to the subject immediately, except in exceptional cases, and in exceptional cases no later than 10 working days;
- 9.4.** The subject is entitled to request correction of the data;
- 9.5.** The data subject is entitled to request temporary suspension (blocking) of data processing in the event that the purposes and/or grounds for data processing, their validity or accuracy are disputed. Data blocking occurs within 3 (three) calendar days from the request;
- 9.6.** The data subject is entitled to request termination of processing, deletion and/or destruction of data about him/her;
- 9.7.** The data subject is entitled to file a complaint with the University in case of violation of the rights and certain rules provided for by the legislation and this Policy. A complaint can also be filed with the Personal Data Protection Service and/or in court;
- 9.8.** The right to receive information about a minor student is reserved for the parent or his/her other legal representative, and in the case of adult students, information about them is provided to the parents only with the student's consent;
- 9.9.** In order to exercise the rights provided for by the Policy, the data subject shall apply to the University with a written application or send a notification to the e-mail address info@neu.edu.ge, which the University shall consider in accordance with the procedure established by the Law of Georgia "On Personal Data Protection";
- 9.10.** The data subject has the right to contact the University's Personal Data Protection Officer without restriction by e-mail at info@dpo.ge or by phone at 555 50 51 58 for information about data processing processes and his/her rights.

Article 10. Responsibility

- 10.1.** The university community is obliged to comply with the personal data protection policy;
- 10.2.** The university ensures that the university community is informed about the personal data protection policy;
- 10.3.** Violation of the personal data protection policy at the university will result in grounds for disciplinary action against the staff;

10.4. Violation of the personal data protection policy by a student at the university will result in grounds for disciplinary action;

10.5. The university ensures technical and organizational security of data processing;

Article 11. Final provisions

11.1. This provision is approved by the university senate;

11.2. This provision of the university comes into force upon signing;

11.3. The provision is adopted, canceled, amended and supplemented by the senate;

11.4. This regulation shall cease to be valid upon approval of the new regulation.