



Personal Data Protection Policy

Data controller and legal framework

Inter-University Centre Dubrovnik is an independent international centre for advanced studies for which legal entity is provided by Association Inter-University Centre Dubrovnik (from now on IUC) with registered seat at Don Frana Bulića 4, 20000 Dubrovnik, CROATIA PIN (OIB): 17492194551. IUC respects your privacy and commits to protecting your personal data.

Data collection and retention is performed in accordance with the provisions of Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), General Data Protection Regulation Implementation Act (OG 42/2018) and other legislation regulating the subject area applicable in the Republic of Croatia.

Scope of implementation

This privacy policy describes what personal data we collect and on which basis, why we process them, how we protect them from unauthorized access and what rights you have regarding your personal data. The policy applies to all processing of personal data within the IUC.

By way of an exception, this Policy has priority over other policies with regard to processing data of service users, in case those other policies prescribe different rights and obligations regarding data processing.

Policy goal

The goal of this Policy is to establish appropriate procedures to protect and manage personal data whose personal data is processed.

Implementation of data protection principles

In the process of implementing this Policy, IUC pays particular attention to compliance with the data protection principles by requesting personal data to be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; having regard to the purposes for which they are processed;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures;

All our employees and partners are obliged to respect the data protection principles.

Categories of personal data

IUC processes the following categories of personal data:

- employees
- members of IUC governing bodies
- members of the IUC Association
- organisers and participants of our courses/conferences
- partners (member institutions)
- external associates
- students/interns

Purpose of data collection

IUC collects personal data necessary to make statistical analysis of its academic programme, to communicate with its participants and other interested parties regarding its academic programme, to communicate with member institution and potential member institution regarding participation of their students and staff at the IUC, to communicate with interested parties regarding participation at the IUC academic programme.

Method of data collection

We collect your personal data in several ways:

- via official IUC web site when users fill out a form
- via data received from organisers of IUC academic programmes

- via filled form directly at the IUC during the academic programme

Types of data we process

IUC collects and processes personal data in accordance with the law.

This refers to the following data (which may be amended with regard to positive regulation):

a)

- name and surname
- passport or ID card number, date of issue (only for individual cases - visa requirements or similar)
- citizenship
- institution/university name
- land address
- title
- occupation
- field of study
- contact details
- date and name of the academic programme which the participant attended

b)

- photos
- videos

Photographs, video and audio recordings posted on the official website of IUC and other communication channels are published on the basis of legitimate interests of IUC to show academic activities at the IUC.

Participants at events organized by IUC are aware that such an event is not private but public, and that there is a legitimate interest of the IUC to record and photograph individuals who were active participants in the event and to publish it on the IUC website, the website of the specific course or conference or on other communication channels.

These photographs may be used for publishing on posters, brochures or other promotional materials. If participants do not wish that their photo, video and audio recording is used for these purposes they must specify this wish to the photographer or at the IUC Secretariat.

When online lectures are being recorded (for the purpose of later publishing on IUC web pages) both lecturers and all participants are informed about it. Written permission will be asked from lecturer in order to publish recorded video lecture.

c)

- other personal data required by employees during the regulation and implementation of awarded scholarships such as identity card data, bank accounts, travel and accommodation details. (only for individual cases)

Use of data

IUC processes the collected data solely for the purpose for which they were provided and/or for the purpose based on the relevant legislation or legitimate interest that arises or is related to the use of the Internet portal of IUC and to the provision of services.

Therefore, the IUC may use personal data to:

- provide information regarding participation in an academic programme;
- help secure accommodation services, help in organizing of trips, meals, coffee breaks, social gatherings and technical services
- produce certificates of attendance
- issue an invoice or provide a receipt for the payment of participation fee

Protection of personal data on the IUC website

The IUC collects only the personal data of participants obtained through the official website www.iuc.hr, provided by course or conference organiser or collected at the IUC in Dubrovnik. The data in question is voluntarily provided by data subjects themselves to the IUC and to the organizer of the academic programme.

The above personal data is used confidentially and only for a specific purpose.

By entering personal data via the official website of the IUC, the data subject gives consent to the IUC to send information about their academic activities.

IUC keeps the personal data of data subjects until a data subject requests that the data is deleted.

In such cases, IUC shall permanently delete and remove data subject's personal data from databases linked to the official website in the shortest possible time. However, an unspecified information regarding participation may remain for statistical purposes (country and institution).

Security of your personal data

We implement appropriate technical and organizational measures to protect your personal data from unauthorized or unlawful processing and against accidental loss, destruction or damage. When giving your personal data via our website, this information is sent over the Internet securely using high-quality encryption and it is stored on our secure servers located in the EU.

Data retention period

Information on participation in IUC academic programmes is kept permanently.

IUC keeps issued and received invoices, documents on account corrections containing personal data, as well as any other documentation relevant for the determination and payment of taxes, for the time limits prescribed by the General Tax Act, or 10 years from the beginning of the statute of limitation period for the right to determine tax liability, provided there are no special regulations prescribing longer periods of retention. The Accounting Act (Official Gazette No. 109/07 and 54/13) prescribes a period of at least 11 years for keeping documents on the basis of which data is entered in the business books, where the period of retention of the above accounting documents starts on the last day of the business year for which the books containing the documents are kept.

Delivery of data to third parties

The data of IUC participants or associates may also be available, if necessary and to a limited extent, to third parties, processors (such as those providing IT services or other services) who store them in their databases until the processing is completed.

The data of IUC participants or associates may also be submitted to the administration of their home institution (mainly name, contact address, date and name of the academic programme the participant has attended).

The data stored at IUC shall never be delivered to the third party for any commercial reason. It is possible in certain situations for us and external entities (organizers of IUC programmes) to jointly determine the purposes and means of personal data processing, whereas these IUC partners and IUC become joint controllers. In these relations, joint controllers shall in a transparent manner determine their respective responsibilities for compliance with the obligations under the Regulation, in particular as regards the exercising of the rights of the data subject and their duties to respect the transparency and confidentiality of data processing.

Transfer of personal data to third countries

A transfer of personal data to a third country or an international organization takes place only when the Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection, in accordance with Article 45 of the General Data Protection Regulation, and such transfer shall not require any specific authorization.

Accessing and updating your personal data

At any time, IUC users have the following rights:

- right to access and review data
- right to information on personal data processing
- right to data transferability
- right to withdraw consent
- right to file a complaint
- right to correction and amendment of personal data in case the personal data is incomplete or incorrect

- right to deletion in cases such as termination of processing purposes, withdrawal of consent or in case of a complaint

Information and submission of complaints regarding the use of your personal data

If you have any questions or complaints about the use of your personal data, please contact us via telephone, e-mail or regular mail as follows:

Telephone: 00385 20 413 626 / 627

E-mail: iuc@iuc.hr

In writing to the address of the seat: Don Frana Bulića 4, 20000 Dubrovnik

via built-in web contact template upon clicking on the website:

<https://iuc.hr/contact>

Procedure for the exercise of the rights of the data subject

- The data subject shall submit a request for the exercise of their right via e-mail specifying their name, surname and request the right they wish to exercise
- The data subject shall receive a response within 30 days from the date of the receipt of their request
- Within 30 days, the IUC shall promptly act upon the request of the data subject

Right to lodge a complaint with a supervisory authority

A complaint about the processing of your personal data may be lodged with the supervisory authority, Croatian Personal Data Protection Agency, Martićeva 14, Zagreb, 00385 (0)1 4609 999, azop@azop.hr, www.azop.hr

This policy shall enter into force upon its adoption on December 2020.

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