

THE PME CENTRE INTERNATIONAL STUDENT PRIVACY NOTICE

1. INTRODUCTION

This privacy notice explains how the Professional Military Education Centre of the Armed Forces Academy of General Milan Rastislav Stefanik in Liptovsky Mikulas, Slovakia (hereinafter referred to as the PME Centre or we, our, us) collects, uses and shares students' (your) personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of the PME Centre.

The personal data processing is regulated by the **Personal Data Protection Act (SVK) no. 18/2018 Coll.** (hereinafter referred to as PDPA). By this PDPA, the Slovak legislation is harmonized with the **General Data Protection Regulation (EU) no. 2016/679** (hereinafter referred to as GDPR).

Both the SVK PDPA and the EU GDPR are applicable as of May 25th, 2018, and they require the PME Centre to protect personal information and to control how it is used in accordance with the legal rights of the data subjects - the individuals whose personal data is held.

All data subjects (international students) are entitled to know:

- a) their rights under PDPA and how to use them;
- b) what the PME Centre is doing to comply with its legal obligations under PDPA.

The PME Centre is committed to the data protection principles of good practice for handling information described in both the PDPA and the GDPR. All personal information are held securely and we will only transfer data within the Armed Forces Academy of General Milan Rastislav Stefanik (hereinafter referred to as the Academy) on a "need-to-know" basis so that we can support our additional / complementary education and other services to you.

2. WHAT THIS DOCUMENT COVERS

This document applies to you if you have ever enrolled or registered to study at the Academy as an international courses' students.

3. WHAT INFORMATION WE COLLECT AND HOW WE DEAL WITH IT

3.1 Information that you give to us

- a) As soon as you contact us, we create a record in your name. To that record we add information that you give us when applying, registering or enrolling and throughout your studies. We keep records of your participation in learning activities and your use of other services we offer, e.g. accommodation and catering services.

- b) We hold general information about you - such as your name, and contact information - such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number.
- c) We will hold the specific information relating to your previous education and employment history, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your examination grades (predicted and actual), assessments and other information in your student record.
- d) You hold also information about “special categories” of data, including your health and medical status or diet requirements; however, we do not collect information about your racial or ethnic origin, religious beliefs, or sexual orientation.

3.2 Information that we automatically collect

- a) We will automatically collect information about your participation in learning and all forms of assessment activities (presentations, briefings, exams, non-anonymous feedbacks of all kinds etc.).
- b) If you use an Academy’ Microsoft Office services, then we collect log data about your use of the service. We may automatically collect technical information when you browse our websites.

3.3. Information we receive from third parties

- a) We may receive some information about you from third parties. We may contact other educational institutions to confirm the qualifications you have obtained.
- b) If your fees are *paid / funded* by a National Authority or *subsidized / reimbursed* by a NATO Authority (e.g. DEEP), we will receive basic information from the funding provider. If your fees are paid by another organisation, they may provide some information about you to us.
- c) If you are not currently studying, we may enhance our records with data received from third parties, in order to ensure we have up-to-date contact details to you, and in order to offer you more relevant communications. We will NOT send you any marketing communications.

3.4 Information we share with third parties

- a) We share data with a number of organisations for specific purposes. For example, when you register as an international course student, we may share some information with the respective Slovak and NATO Authorities.
- b) We may also transfer your personal information if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our enquirers, visitors and students. However, we will always aim to ensure that your privacy rights continue to be protected.

3.5 International students' personal data utilization

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- a) admissions;
- b) academic matters, including:
 - the provision of our core teaching, learning and individual training services (e.g. registration, assessment, attendance, managing progress, certification, graduation);
 - maintaining student records; etc.
- c) providing library, IT and information services;
- d) non-academic matters in support of our core services, including:
 - providing student support services (e.g. Additional Learning Support, Health Service, Student Medical);
 - safeguarding and promoting the welfare of students;
 - ensuring students' safety and security;
 - managing student accommodation;
 - managing the use of social media;
 - managing car parking in campus;
 - managing catering services in campus.
- e) administering finance (e.g. fees and scholarships);
- f) other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits and accreditation (e.g. to ensure compliance with National and NATO regulatory and/or legal obligations);

- providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);
- notification services (e.g. providing information on mandatory meetings or other events happening on and off campus);
- preventing and detecting crime;
- dealing with grievances and disciplinary actions;
- dealing with complaints and enquiries.

3.6 Graduation and degree information

Personal data (including award and classification) may be published in the award ceremony booklet. This information may also be passed to third parties involved in the ceremonies and to our periodical magazine. All published details will be available on our archive and our website following the relevant graduation events.

You may withhold your consent to your name being published for these purposes when you request to attend the award ceremony or graduate *in absentia*.

3.7 Transfer of personal data outside the European Economic Area (EEA)

Generally, information you provide to us is stored on our secure servers, which are located within EEA (at the Academy).

However, in case of international students coming from outside of EEA countries (some NATO member and Partner countries), we transfer your personal information (e.g. graduation and degree information, student detailed assessments, etc.) back to your National Authorities outside the EEA. In this case, we will take steps to ensure that appropriate security measures are taken to protect your privacy rights as outlined in this policy.

4. LENGTH OF TIME WE KEEP YOUR PERSONAL INFORMATION

If we collect your personal information the length of time we keep it for is determined by a number of factors including our purpose for using the information and our legal obligations.

We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose:

- a) We keep academic transcript data at least until student date of graduation + 30 years, in order to provide references and verify your study with us.
- b) We keep some information relating to the study programme or course, and related queries and communications, until 5 years after you have completed

the study programme or course, in order to inform our ongoing relationship with you, and in case it is necessary to establish, bring or defend legal claims.

- c) We destroy some information within 2 years, where it does not have a long-term impact, and is not required for our business purposes. For example, we will destroy some data that is relevant to exams and assessment or medical records shortly after the course result is decided, and we will only keep the result itself.

5. INTERNATIONAL STUDENTS' USE OF PERSONAL DATA

Students are not usually expected to collect or use personal data as part of their studies at the PME Centre, but if you need to do so you must get the agreement of your tutor or supervisor that the processing is necessary, for example for your assignment or research.

You must also immediately tell our Data Protection Officer, using the contact details in the Personal Data Protection Policy of the Armed Forces Academy.

6. INTERNATIONAL STUDENTS' RIGHTS

The PME Centre will comply with requests from an individual to exercise their rights under the PDPA and GDPR. Pursuant Art 15 of GDPR, all individuals have the right to obtain information from the PME Centre what personal data concerning him or her are being processed, and access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Individuals also have the following rights in relation to their personal data:

- I. The right to request their personal data is rectified if inaccurate.
- II. The right to request erasure of their personal data (“right to be forgotten”).
- III. The right to request that the processing of their personal data is restricted.
- IV. The right of portability in relation to their personal data.
- V. The right to object to the processing of their personal data.
- VI. The right to object to processing which involves automated decision making or profiling.

Individuals who wish to exercise the above rights should contact the PME Centre Data Protection Officer. Individuals should submit their request in writing and specify exactly what personal data and/or processing they are referring to and which right they wish to exercise.

All staff are responsible for cooperating with PME Centre Data Protection Officer to ensure that the PME Centre can comply with an individual’s request under the PDPA and GDPR within the statutory timescales.

The PME Centre will provide the requested information free of charge. However, a fee may be charged when a request is manifestly unfounded, excessive or repetitive taking into account the administrative costs of providing the information or the PME Centre may refuse to respond to the request. A fee may also be charged for further copies of the same information.