

**UNIVERSITY OF CENTRAL LANCASHIRE,  
CYPRUS  
(UCLAN CYPRUS)**

**DATA PROTECTION POLICY**



**Approved:** October 2018 (Last Reviewed: 21 March 2019)

**Data Protection Officer:** Stylianos N. Christoforou, Barrister at Law

## **UCLAN CYPRUS**

### **Data Privacy Policy – Educational Services**

This Privacy Policy explains how and why, the University of Central Lancashire Cyprus (“we” or “UCLan Cyprus”), collects information about you, what we do with it and it also explains your rights under the General Data Protection regulation (GDPR). In legal terms, we are the data controller, as we determine the means and/or purposes of the processing of the personal data held by us. Why might, in some cases, have the role of the processor. Such cases are the ones in which we process data on behalf of a controller. Whether we are the controller or the processor, the personal data stored and processed within the UCLan Cyprus follows the current policy.

The General Data Protection Regulation (GDPR) governs how we take care of the information we hold about you. The first principle of the Regulation is that your personal information must be processed fairly and transparently. We have an obligation to let you know how we will take care of the information about you and what we will use it for.

### **Why do we collect and use your personal information?**

We might process personal information relating to students and academic staff. We gather the following information to facilitate with the provision of academic services and other associated functions:

- We process student personal data such as name, age, nationality, gender, email, telephone number, ID number, passport number, bank account information and others to register a student at the UCLan Cyprus.
- We process academic staff and other employees’ data name, email, telephone number, academic title, research interests and others to match them as advisors to students with similar research interests.

### **We collect and use your information under the following lawful bases:**

- where we have consent by you;
- where necessary to execute a contract with you;
- where necessary for compliance with a legal obligation;
- where processing is necessary to protect the vital interests of you or of another person;
- where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- where justified by the legitimate interest of the UCLan Cyprus or of your legitimate interest or other’s.

### **The information that we collect, hold and share may include:**

We hold personal data about students to support teaching and learning and to assess the quality of education provided by Uclan Cyprus as well as how the university is performing. We may also receive data about students from other organizations including but not limited to: Universities, Colleges, the Ministry of Education, National Statistics Authority.

The abovementioned data may include but is not restricted to:

- Basic details such as name, address, date of birth, phone number
- Results of exams, presentations, assessments
- Academic achievements
- Data on student characteristics such as ethnic group, any special educational needs (e.g. dyslexia) any personal/familial circumstances (e.g death of a loved one) that could affect their mental state and therefore may affect their studies
- Exclusion information
- Details on any medical conditions that may affect the studies
- Any information that may affect the student's mental state
- Records of disciplinary procedures and
- Images of the CCTV system we have installed in the UCLan Cyprus premises

We also hold personal data about lecturers/academic staff and other UCLan Cyprus employees to offer our educational services. We may also receive data about academic staff from other organizations including but not limited to: other Universities, Colleges, the Ministry of Education, National Statistics Authority.

The abovementioned data may include but is not restricted to:

- Basic details such as name, address, date of birth, phone number
- Appraisals and/or reviews of the academic staff
- Academic and work experience
- Financial information such as Social Security Number and bank account details
- Images of the CCTV system we have installed in the Uclan Cyprus premises

### **How long is your general data retained?**

Academic records that include personal data of students and staff are kept at the UCLan Cyprus for as long as UCLan Cyprus needs them for, either within the scope of the relationship with UCLan Cyprus or as part of a legal obligation or to safeguard the legitimate interests of the UCLan Cyprus, as part of the Students' Archive.

Some data related to your employment with UCLan Cyprus will be deleted 4 years after the termination of the corresponding employment/service agreement and the remaining will be deleted once all legal obligations of UCLan Cyprus have been fulfilled and all safeguards of UCLan Cyprus' legitimate interest have been taken.

Any data regarding employment candidates will be deleted after the corresponding vacancy fulfillment unless you have otherwise consented.

For any employees of UCLan Cyprus, the financial and tax related information are kept for 7 years extendable to another 7 if a tax obligation arises, after the corresponding transaction as per our obligations under the Law.

We keep the CCTV images of our premises for period of 21 days to ensure the security of the people visiting, working or studying in our premises and to secure our infrastructure and assets for unlawful actions.

### **Who do we share personal data with?**

We will not share information about students with anyone without the student's consent, unless the law and our policies allow us to do so. Data subjects who wish to receive a copy of the information we hold about them can request so at the related department; for alumni records to Student Support Department, for student records to Administration Department, for student enquirers and applicants to Admissions Office, for financial records to Finance Department, and for staff of UCLan Cyprus to the HR Department.

We are required by law to transfer certain information about students to specified external bodies which include the Ministry of Education, the Cyprus Agency of Quality Assurance and Accreditation in Higher Education, the Migration Services, the Foundation for the Management of EU Lifelong Learning programs, so that they can meet their statutory obligations.

As a UCLan branch we share your data with our mother university, the University of Central Lancashire, in Preston, UK, only in electronic form, who are processing the information for the administration and provision of education and training, calculation of exam results, validating and producing educational material, administrating applications, assessing support in cases of disabilities, compilation of statistics, assessment of offers, administration of awards, alumni records, etc. UCLan Cyprus may send personal applicant and student data electronically to UCLan UK which will then input and maintain the data into the student's records system utilized by both UCLan Cyprus and UCLan UK. This relationship is further described in detailed under the Data Processor Agreement between the campuses.

We may also be asked by statutory bodies to share basic information about you, such as your name and address. When this happens, it is normally because it will assist them to carry out their statutory duties.

In any event that we should share personal data with third parties apart from the Public Authorities, we will ensure a Data Processing Agreement is in place that will establish the rules of such transfer and ensure the security and privacy of your data and we will provide only the minimum amount of personal data necessary to fulfill the purpose for which we are required to share the data.

We may transfer some of your personal data to financial institutions and/or auditors and/or legal representatives to execute payments or take other actions in order to execute a contract or to be in accordance with the Law.

We do not share information about anyone without consent unless the law allows us to do so. You have the right to refuse/withdraw consent to information sharing at any time. Any possible consequences will be fully explained to you and could include delays in receiving care.

If you make an enquiry, we may sometimes share your information with external organisations and bodies, some of which are processing personal data on our behalf. We only share your personal data with another person or organisation where the law allows us to and we consider it to be appropriate under the circumstances. The external parties we may share information with include the following:

- **Companies or organisations acting on our behalf:** We use data processors who are third parties who provide elements of services for us. We ensure to have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will hold it securely and retain it for the period we instruct.
- **International agents** who have an agreement with us and with whom you have given your details so that they can pass on your enquiry to us.

#### **Non-EU Students and transfers to non-EU countries:**

We generally do not transfer personal data outside of the EU, except UK under UCLan UK. Personal data of non-EU students may sometimes be transferred to their country of origin following a request from the student's home country government or authorities. Where possible we will try to ensure that the country meets an adequate level of protection for the right and freedoms of data in relation to the processing of personal data and we will only share data once a signed set of Standard Contractual Clauses (SCC) is in place between us and them.

#### **Your rights:**

- To have access to your personal data
- To object to the processing of personal data that is likely to cause, or is causing, damage or distress;
- To prevent processing for direct marketing;
- To have your personal data deleted (under conditions);
- To have your personal data rectified.

You can exercise any one and all of your rights by submitting a Subject's Rights Request Form that is provided by the Data Protection Officer and mailed to:

**Mr. Stylianos N. Christoforou**

**UCLan Cyprus**

University Av. 12-14

Pyla 7080

Cyprus

Or electronically to the **Data Protection Officer** at [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy)

If you have a concern about the way we are collecting or using your personal information, you should raise your concern with us in the first instance or directly to the office of the Commissioner for the Protection of Private Data.

**Office of the Commissioner for the Protection of Private Data**

1 Iasonos st.

1082 Nicosia

Cyprus

Telephone number: 22818456

Fax number: 22304565

To get an in depth knowledge about how we use your information please contact our Data Protection Officer at [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy)