



NEAPOLIS UNIVERSITY PAFOS STUDENTS

PRIVACY POLICY

This page provides information about the use of personal data while you are a student at Neapolis University Pafos.

1. What is 'personal data'?

'Personal data' means any information relating to identified or identifiable natural person.

2. Who will process my personal information?

As a data controller, Neapolis University Pafos (NUP) is responsible for deciding how it holds and uses personal data about you.

The said policy provides an overview of how NUP process your personal data and your rights under the GDPR, the applicable local legislation (as amended from time to time) and any other relevant legislation.

The lists and examples below are illustrative, non-exhaustive and not fully representative for every individual within the University. This Policy may be supplemented by additional notices, policies or guidance ("**Additional Policies**").

The information here applies to the use, sharing and disclosure of your personal data by NUP, including its Departments, Institutes and Research Centres/Units. NUP's Departments, Institutes and Research Centres/Units work together closely and share your personal data for a variety of academic, administrative and statistical purposes in accordance with the Regulation and/or structured Policies and Procedures.

3. What personal data will be processed?

NUP will keep a record of the details you provided on your student application form, any supporting documents requested as part of your admission and additional details provided by any third parties. We will also maintain records about your studies at NUP, and about your use of the academic and non-academic facilities and services that we offer. This personal information will include data such as your name, home address, date of birth, course studied, tuition fee payments, and information about your examinations, assessments and results.

Your personal data is stored and transmitted securely in a variety of paper and electronic formats, including databases. Access to your personal information is limited to University staff who have a

legitimate interest for the processing, for carrying out their contractual duties. The use of your personal information will not be excessive.

In addition to this, the University may process some information about you that is classed as 'sensitive' or 'special category' personal data, and which requires additional protections. This includes information concerning your ethnicity, sexual orientation, religious beliefs or health/special needs that we use for planning and monitoring purposes, or in order to provide care, help or suitable adjustments.

In this case the said data are collected from you and you be given further details about our use of any such data.

4. What is the purpose and legal basis of the processing?

The University will process your personal data for contractual, statutory or public interest purposes, including the following:

- To deliver and administer your education, record the details of your studies (including any placements with external organisations), and determine/confirm your academic achievements (e.g. results, prizes).
- Where relevant (e.g. for PhD students), to monitor, evaluate and support your research activity.
- To administer the financial aspects of your relationship with us.
- To deliver IT facilities to you. Some of these IT services are specific to an educational context (e.g. anti-plagiarism software).
- To deliver facilities and services to you (e.g. sport, libraries, accommodation, careers).
- To enable your participation at events (e.g. clubs, graduation).
- To communicate effectively with you by post, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security (including CCTV) disciplinary procedure (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements. Note that information collected for a different purpose may be re-used for disciplinary purposes, including to identify you, where this is proportionate and necessary (e.g. CCTV images).
- To support your training, medical, safety, welfare and religious requirements including the use of your personal information in relation to the University's COVID-19 prevention activity.
- To compile statistics and conduct surveys and research for internal, statutory reporting, or public or legitimate interest purposes.
- To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation.

- To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).

We consider the processing of your personal data for these purposes to be necessary for the performance of our contractual obligations with you (e.g. to manage your education, student experience and welfare while studying at NUP), necessary for compliance with a legal obligation (e.g. visa monitoring), necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research), necessary for the pursuit of the legitimate interests of the University.

We require you to provide us with any information we reasonably ask for to enable us to administer your student contract. If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this at any time. In the rare occasion where we ask for any sensitive information, such as that concerning your ethnicity, sexual orientation, religious beliefs or health/disability, you will normally have the option to refuse your consent by not supplying it.

We will not use your personal information to carry out any wholly automated decision-making that affects you.

5. Who will my personal data be shared with?

As described above, your personal data is shared with relevant staff at the NUP as required. In addition, when necessary it may be shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following:

- Statistical Service
https://www.mof.gov.cy/mof/cystat/statistics.nsf/index_en/index_en?OpenDocument
- Your funders and/or sponsors (e.g. Research Councils, consortium partners, the funders of any awards or prizes).
- Relevant Government Departments (e.g. Ministry of Education, Culture, Youth and Sports, Ministry of Health, Migration Office)
- The police and other law enforcement agencies (when necessary).
- Work Placement in companies and enterprises, both locally and/or Pan-Cyprian via the NUP Liaison Office, see <https://www.nup.ac.cy/the-university/the-liaison-office/>
- Workshops and seminars of educational and professional interest as well as Career Days in collaboration with the Career Office of the University, see <https://www.nup.ac.cy/the-university/careers-services/>

● On occasion, sharing may involve the transfer of your personal information outside the European Economic Area (EEA) (e.g. to facilitate your participation in an exchange visit or in an Erasmus+ Traineeship Program in a country outside EE see <https://www.nup.ac.cy/study-in-cyprus/erasmus-traineeship/>)

Such transfers usually are necessary in order to meet our contractual obligations with you, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

Other than as set out above, we will not publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

6. How is my personal data used after I graduate?

After you graduate, a core record of your studies is retained indefinitely so that the details of your academic achievements can be confirmed as well as for statistical or historical research. Your contact and core personal details are passed to the Alumni Office while you are still a student, via a relevant form in Moodle, so that you can be added to the alumni database see *Privacy Notice for Alumni at* https://www.nup.ac.cy/wp-content/uploads/2021/04/PRIVACY-NOTICE-FOR-ALUMNI-NUP_.pdf

7. How can I access my personal data?

You have the right to access the personal data that is held about you by the University.

You also have the right to ask us to correct any inaccurate personal data we hold about you, to delete personal data, or otherwise restrict our processing, or to object to processing or to receive an electronic copy of the personal data you provided to us. Keep in mind that all of these rights are met in different ways and under certain conditions.

8. How long is my personal data kept?

We store your personal data as part of your student record for the duration of your studies. NUP retains personal information it collects from you where there is an ongoing legitimate business need (legitimate interest) to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When there is no ongoing legitimate business need (legitimate interest) to process your personal information, NUP will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then NUP will securely store your personal information and isolate it from any further processing until deletion is possible.



9. Who can I contact?

If you have any questions about how your personal data is used, or wish to exercise any of your rights, please consult the University's Data Protection Officer at dpo.nup@nup.ac.cy or visit <https://www.nup.ac.cy/the-university/data-protection-office/>

10. How do I complain?

If you are not happy with the way your personal data is being handled, or with the response received from us, you have the right to lodge a complaint with the **Office of the Commissioner for Personal Data Protection** at:

Office address:

Iasonos 1, 1082 Nicosia, Cyprus

Postal address

P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_el/home_el?opendocument

11. Are changes made to this document?

This document was last updated in April 2021. It is reviewed when necessary and at least annually. Any changes will be published here and you will be notified via Moodle and/or by email.