



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Privacy notice for the Student applicants, Master’s degree candidates and PhD candidates at Sofia University “St. Kliment Ohridski”

Information regarding the Controller:

Legal name	Sofia University “St. Kliment Ohridski”
VAT	BG000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., 1504, Sofia, Bulgaria
Address of correspondence	15 Tzar Osvoboditel Blvd., 1504, Sofia, Bulgaria
Phone number	(+359) 2 9308 200
Website	https://www.uni-sofia.bg/

Information regarding the Data Protection Officer:

Name	Assoc. Prof. Parvan Parvanov, PhD
Address of correspondence	15 Tzar Osvoboditel Blvd., Room 12, 1504, Sofia, Bulgaria
Phone number	(+359) 2 930 84 23, (+359) 2 943 43 19
E-mail	dpo@uni-sofia.bg

Information regarding the supervisory authority:

Legal name	Commission for Personal Data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., 1592, Sofia, Bulgaria
Phone number	(+359) 2 915 3 518
Webpage	www.cdpd.bg



SOFIA UNIVERSITY “ST. KLIMENT OHRIDSKI”

Sofia University “St. Kliment Ohridski” (hereinafter referred to as “Controller”, “the University” or “we”) performs its activities in accordance with the Bulgarian Personal Data Protection Act and the EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. This document aims to inform you about all aspects of the collection and processing of your personal data by the University and the rights you have, in relation to that processing.

Legal grounds for collection, processing and storage of your personal data

Art. 1. (1) The University collects and processes personal data for the following categories of persons for carrying out admission campaigns at Sofia University for application in a Bachelor's or Master's degree levels as well as conducting campaigns for PhD candidates and for the conducting of the educational process in the University:

- Student applicants;
- Master's degree candidates;
- PhD candidates.

(2) The University collects and processes your personal data as Student applicants, Master's degree candidates, PhD candidates under art. 6, para. 1, Regulation (EU) 2016/679 (GDPR), and in particular based on the following:

- For compliance with a legal obligation to which the controller is subject;
- For the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Your explicit consent for processing some categories of personal data.

(2) The University performs its activities in accordance with the legislation and the Higher Education Act, published in State Gazzete No 112 of December 1995, and with all subsequent amendments and additions of the Act, Decrees of the Council of Ministers, as well as with the Organization and activity regulations of the Sofia University “St. Kliment Ohridski” and the Decisions of the Academic Council.

Objectives and principles in the course of collection, processing and storage of your personal data

Art. 2. (1) The University collects and uses your personal data for the participation in admission campaigns for the purposes of registration of the student applicants in the online enrollment system or for the enrollment of the Master's degree candidates in the campaign for admission of master students, for the individualization of the applicant, contacting with the applicants, submission of information to the applicants, determining whether the applicant complies with the requirements set out in the Organization and activity regulations of Sofia University “St. Kliment Ohridski”.



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(2) The University uses your personal data in anonymised form, which does not allow your individualisation, for the purposes of statistics and summary of the information on trends in admissions.

Art. 3. The University collects and processes the personal data of the PhD candidates for the purposes of the administration of the process of the recruitment competition, classification, announcement of the results, enrollment, as well as during the entire learning process and obtaining of PhD degree.

Art. 4. (1) In the course of collecting, processing and storage of your personal data, as student applicant, Master’s degree candidate, PhD candidate in Sofia University “St. Kliment Ohridski”, the University adheres to the following Principles:

- lawfulness, fairness and transparency;
- proportionality with the processing purposes and data minimization;
- accuracy and relevance of the data;
- storage limitation in accordance with purpose achievement;
- integrity and confidentiality of the processing and ensuring an adequate level of security of the personal data.

(2) The University collects and uses only your personal data, which is necessary for carrying out the admission campaign for students applicants, the admission campaign for Master’s degree candidates and conducting campaigns for PhD candidates.

Art. 5. In course of processing and storage of personal data, the University can process and store personal data, including to perform its obligations towards state and municipal bodies.

What types of personal data does the University collect, process and keep related to student applicants, candidates for “Master” degree after completed “Bachelor” degree and PhD candidates

Data, related do student applicants for acquisition of “Bachelor” degree

Art 6. (1) The University performs the following operations using the personal data, provided by you as a student applicant during the registration in the online enrollment system or during the submission of application for appearance in entrance exam, which submission takes place in the Information centre of the Rectorate, department “Students enrollment”, or at the partners’ offices across the country:

- **Enrollment of students for entrance exam:** The University processes your personal data for the creation of profile in the online enrollment system, which enables you to sign in for entrance exam for the current enrollment campaign, to check the place and date of the exams, for which you signed, to check your exam results, to list your classification wishes and to check the campaign results. The University processes your personal data for signing for entrance exam in accordance with your request submitted



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through the online system request, also for sending and providing information about the carrying out of the examination and the examination result.

- **Personal data, collected and processed in the performance of operation:** name, father's name and surname or another name according to the Identity Card, Personal identification number (PIN) or Personal identification number of foreigner, email address, address, district, phone number, year of graduation, sex, date of birth, health data.

Conclusion of Data protection impact assessment of the operation: Operation „Enrollment of students for entrance exam“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The University performs the following operations with the personal data, provided by you at the submission of ranking documents:

- **Registration of students for ranking from the entrance exam:** The University processes your personal data for ranking of the applicant in the specialities, chosen by him.
 - **Personal data, collected and processed in the performance of operation:** name, father's name and surname or another name according to the Identity Card, Personal identification number (PIN) or Personal identification number of foreigner, address, district, phone number, year of graduation, data about graduation of high school/college, data about participation in Olympiad or internal exams, data about speaking of foreign language, health data, sex.

Conclusion of Data protection impact assessment of the operation: Operation „Registration of students for ranking from the entrance exam“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

- **Ranking of student applicants:** the University checks the data, provided by you at the registration for the students application campaign with the data from the documents, which you have submitted for the participation in the ranking, and after the verification the University processes the documents and data, provided by you for the ranking process of the exam results of the student applicants.

Conclusion of Data protection impact assessment of the operation: Operation „Ranking of student applicants“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

Art. 7. The student applicants can submit documents for submission in the entrance exams and for ranking in the offices of the Centre for preparation of student applicants and for information about the acceptance of student applicants documents and in the offices of the National association for enrollment of students, which organisations process personal data on commission by the University.

Data, related to “Master” degree candidates after university graduation



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Art. 8. (1) The University performs the following operations with the personal data, provided by you as "Master" degree candidates after previous university graduation, at the submission of documents in the relevant Faculty for participation in campaigns, competitive exams and ranking:

- **Registration of candidates for enrollment in "Master" degree and ranking:** The University processes your personal data for your registration for participation in a campaign or competitive exam for enrollment in "Master" degree in the speciality, chosen by you, in the relevant Faculty, carrying out of the competition or exam, and the ranking.
 - **Personal data, collected and processed in the performance of operation:** name, father's name and surname or another name according to the Identity Card, Personal identification number (PIN) or Personal identification number of foreigner, email address, address, district, phone number data from the Identity Card, year of graduation, data about university graduation, sex, date of birth, health data.

Conclusion of Data protection impact assessment of the operation: Operation „Registration of candidates for enrollment in "Master" degree and rating“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

Data, related to PhD candidates

Art. 9. (1) The University collects and processes data, related to PhD candidates at the submission of application for participation, as well as at successful ranking and enrollment of PhD candidate.

(2) The University performs the following operations with the personal data, provided by you as a PhD candidate:

- **Carrying out campaigns for PhD candidates:** The purpose of the operation is administration of the process of carrying out of campaigns for PhD students, ranking of the participants in the campaign, announcement of competition results and enrollment of the PhD candidate in full-time or part-time learning form.
 - **Personal data, collected and processed in the performance of operation:** names, address, PIN/Personal number of foreigner, phone number, email address, data about university graduation and degree of received degree, etc.

Conclusion of Data protection impact assessment of the operation: Operation „Carrying out campaigns for PhD candidates“ is acceptable for performance and provides enough guarantees for the protection of rights and legal interests of data subjects in accordance with the requirements of Regulation (EU) 2016/679 (GDPR).

Art. 10. (1) The University does not collect and process personal data, related to the following:

- Revealing racial or ethnic origin;
- Revealing political religious or philosophical beliefs, or trade union membership;



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- Genetic and biometric data, health data, sexual life or sexual orientation data.
- (2) The University collects and processes candidates' health personal data in accordance with given consent by them or on the basis under art. 9, para. 2, letter “a” of Regulation (EU) 2016/679, for the purposes of exemption from application fee in accordance with the requirements in the Rules and for provision of suitable conditions for carrying out the exams.
- (3) Personal data are collected by the Controller for the persons, whom the data concern.
- (4) The Collector does not take automatic decisions, related to the data.
- (5) The University does not collect and process data, related to natural persons, who are under 16 years-old.

Duration of personal data storage

Art. 11. (1) The University keeps your personal data as a student applicant for the whole period of carrying out the student application campaign, for which you have registered, and for a period of:

- 1 year after the expiration of student application campaign for applications for participation;
- 1 year after the expiration of student application campaign for student applicant's works;
- 5 years after the expiration of student application campaign for the exam protocols and alphabetic guides.

(2) Data, related to enrolled and registered students, is kept and after the periods, described in para. 1, in accordance with the Nomenclature for the files of the Sofia University.

Art. 12. (1) The University collects your personal data as “Master” degree candidates after the university graduation for the whole period of the campaign, for which you have registered, and for a period of 1 year after the expiration of the campaign.

(2) The data, related to enrolled and registered “Master” degree students, are kept and after the periods, described in para. 1, in accordance with the Nomenclature for the files of the Sofia University.

Art. 13. (1) The University collects your personal data, which you provided at your registration as PhD candidate for 1 year after the expiration of the campaign.

(2) The data, related to the assigned PhD candidates, is kept and after the periods, described in para. 1, in accordance with the Nomenclature for the files of the Sofia University.

Art. 14. (1) After the expiration of the storage periods the University takes the necessary steps to erase and destroy all your personal data, without undue delay or to anonymise (which means to make them in a form, that does not reveal your personality) and delete your profile in the online enrollment system.

(2) The University keeps documents, files, protocols, etc., in accordance with the legal requirements of the current legislation and the Nomenclature for the files with the durations of their storage, approved by the Principal.



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Transmission of your personal data for processing

Art. 15. (1) The Controller is allowed on its own decision to transmit all or part of your personal data to processors for the performance of the purposes of processing, with which you have agreed, with respect to the requirements of Regulation (EU) 2016/679 (GDPR).

(2) The Controller informs you in case of intention to transmit all or part of your personal data to third countries or international organizations.

Your rights in the course of collection, processing and storage of your personal data

Withdraw of the consent for processing of your personal data

Art. 16. (1) If you do not want the University to continue to process all or part of your personal data, which are processed on the ground of given consent for specified or all processing purposes, you can, at any time, withdraw your consent for processing by request, incorporated in free text, or by completed form in Appendix No 1, sent by email or on paper.

(2) The Controller is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting Identity Card on-the-spot.

(3) The withdraw of the consent does not affect the examination of the processing of the personal data, provided by you until the moment of the withdraw of the consent.

(4) You can at any time withdraw your consent for processing your personal data for the purposes of direct marketing.

(5) The University is allowed to continue to process all or part of your personal data, if there is a legal obligation for the processing or for the purposes of the protection of the University's legitimate interests.

Right of access

Art. 17. (1) You have the right to request and receive confirmation from the Controller if there is a processing of personal data, related to you.

(2) The Controller is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning, by presenting Identity Card on the spot.

(3) You have the right to gain access to the data, related to you, as well as to the information, regarding collecting, processing and storage of your personal data.

(4) The Controller provides you, if there is a request from you, a copy of the processed personal data, related to you, in electronic or other appropriate form.

(5) Providing of data access is free, but the Controller keeps his right to determine administrative fee, in case of repeatability or excessiveness of the requests.



Right of correction or completion

Art. 18. (1) You have right to request from the controller to:

- to rectify the inaccurate personal data, concerning you;
- to complete incomplete personal data, concerning you.

(2) The Controller is allowed to request you to prove your identity and the identity with the person, for whom the data is regarding, by presenting Identity Card on the spot.

Right to erasure ("Right to be forgotten")

Art. 19. (1) You have the right to request the Controller to erase all or part of your personal data, and the Controller has the obligation to erase such data without undue delay, when one of the following grounds applies:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You have withdrawn your consent on which the processing is based and where there is no other ground for processing;
- You have objected to the processing of personal data, relating you, and there are no legal grounds for the processing, which have advantage;
- Personal data have been processed illegally;
- Personal data shall be erased for the purpose of legal obligation under European Union Law or the law of Republic of Bulgaria, which obligations are in force against the Controller;
- Personal data have been collected in connection with the offer of services of information society.

(2) The Controller is not obligated to erase the personal data, if he keeps and processes them:

- for exercising the right of freedom of speech and the right of information;
- for compliance with legal obligation, which requires processing, determined in European Union Law or the law of Republic of Bulgaria, which obligation is in force against the Controller or for the performance of a task in public interest or for performance of official powers, provided to the Controller;
- in public interest, related to the public health;
- for the purposes of archiving in public interest, for scientific or historic researches or for statistic purposes;
- for establishment, exercise or defence of legal claims.

(3) In case that the grounds, described in art. 1, are present, the Controller will erase all of your personal data, except your Personal identification code (PIN), for the purposes of accountability.



(4) To exercise your right to be forgotten, you shall send a request in free written form or to fill the form in accordance with Appendix No 2 by email or on paper, and you shall identify yourself by presenting Identity card.

Right to restriction of processing

Art. 20. (1) You have right to request the Controller to restrict the processing of the personal data, concerning you, when:

- The accuracy of the personal data is contested by you, for a period, which allows the Controller to check the accuracy of the data;
- The processing is unlawful, but you oppose the erasure of personal data, and request only for the restriction of their usage;
- The Controller no longer needs the personal data for the purposes of the processing, but you require them for establishment, exercise or defence of legal claims;
- You objected to the processing pending the verification whether the legitimate grounds of the controller override your legal interests.

(2) The Controller is allowed to ask you to prove your identity and the identity with the person, for whom the data is regarding, by presenting on site an Identity Card.

(3) The Controller is allowed to continue the processing of your personal data, if there is a necessity for establishment, exercise or defence of legal claims, defence of another natural person or in accordance with important requirements of public interests.

Right to data portability

Art. 21. (1) If you have given consent for processing of your personal data or the processing is necessary for the execution of the contract with the Controller, or if your data are automatically processed, you are allowed, after legitimation before the Controller, to:

- require from the Controller to provide you your personal data in readable format and to transfer them to another Controller;
- require direct from the Controller to transfer your personal data to Controller, who is chosen by you, when this is technically possible.

(2) The Controller is allowed to request you to prove your identity and the identity with the person, for whom the data is concerning, by presenting on site an Identity Card.

(3) You can exercise your right to data portability by sending request in free form or by filling the form in accordance with Appendix No 3 by email or on paper.

Right to receive information

Art. 22. You have the right to require from the University to inform you about all recipients, to whom your personal data, for which has been required rectification, erasure or restriction of



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processing, have been disclosed. The University is allowed to refuse to provide this information if this is impossible or involves disproportionate effort.

Right to object

Art. 23. You have the right to object at any time to processing by the Controller of personal data concerning you including when the processing is for the purpose of profiling or direct marketing.

Your rights in case of personal data breach

Art. 24. (1) When the University detects personal data breach, which is likely to result in a high risk to your rights and freedoms, the University communicates the personal data breach to you without undue delay, as well as the measures taken or proposed to be taken.

(2) The Controller is not obliged to inform you if:

- the Controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach;
- the Controller has taken subsequent measures which ensure that the high risk to your rights is no longer likely to materialize;
- it would involve disproportionate effort.

Persons, to whom your personal data is provided

Art. 25. For the described purposes of processing your personal data, the University is allowed to provide your personal data to third parties data processors, who comply with all requirements of legality and security when processing and storing your personal data.

Art. 26. The University provides your personal data to the Ministry of Education and Science and other public authorities on the grounds, laid down by the Bulgarian legislation and for carrying out statutory duties.

Art. 27. The personal data of the students is processed with taken measures to restrict the access to the personal data and high level of security and protection, as the employees of the University and its administrative units, including the relevant Faculty, as well as academic teachers, have access and may process personal data of the students, only regarding conducting the activities of the University.

Art. 28. The Controller does not transfer your personal data to third States or international organisations, unless there is a ground for that and after the data subject has been duly informed.

Art. 29. In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:





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Legal name	Commission for Personal data Protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address of correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Phone number	02 915 3 518
Web page	www.cpdp.bg

Art. 30. You can exercise all your rights regarding the protection of your personal data via the forms attached to this Privacy notice. Of course, these forms are not obligatory and you can address your requests in any form, which contains a statement for that and identifies you as the data subject.



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Appendix No 1

Exemplary forms of withdrawal of consent for processing purposes

Your name*:

Personal identification number*:

Feedback data (e-mail, phone number)*:

To

Legal name	Sofia University "St. Kliment Ohridski"
UIC	000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Phone number	(02) 9308 200
Website	https://www.uni-sofia.bg/

I withdraw my consent for collection, processing and storage of the following personal data, provided by me:

All personal data provided by me

Only these data

for the following purposes:

Following purposes:

.....

All purposes

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for personal data protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592



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Address for correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Phone number	02 915 3 518
Web page	www.cdpd.bg

Signature:



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Appendix No 2 –

Request “to be forgotten” – for erasure of personal data related to me

Your name:*

Personal identification number:*

Feedback data (e-mail, phone number):*

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Phone number	(02) 9308 200
Webpage	https://www.uni-sofia.bg/

I request all personal data, which you are collecting, processing and storing, provided by me or third persons, which is related to me, according to the specified identification, to be erased from your database.

I declare that I am aware of the fact that all or part of my personal data may continue to be collected processed and stored from the collector for the purpose of performing legal obligations.

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for personal data protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address for correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Phone number	02 915 3 518
Webpage	www.cdpd.bg

Signature:



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Appendix No 3 – Request for portability of personal data

Your name*:

Personal identification number*:

Feedback data (e-mail, phone number)*:

To

Legal name	Sofia University “St. Kliment Ohridski”
UIC	000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Phone number	(02) 9308 200
Webpage	https://www.uni-sofia.bg/

I request all personal data related to me, which has been collected, processed and stored in your database to be sent to:

e-mail:

Controller – recipient of data:

Legal name

Identification number (UIN, BULSTAT, other)

E-mail

Please, transmit my personal data in the following format:

XML

JSON

CSV

Other:



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I wish my personal data in the chosen format to be transmitted to me or specified by me data collector:

to the specified e-mail

to a physical carrier or electronic carrier (CD, DVD, USB)

Other:

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for personal data protection
Seat and registered office	гр. София 1592, бул. „Проф. Цветан Лазаров” № 2
Address for correspondence	гр. София 1592, бул. „Проф. Цветан Лазаров” № 2
Phone number	02 915 3 518
Web page	www.cdpd.bg

Signature:.....



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Appendix No 4 –

Request for rectification of personal data

Your name*:

Personal identification number*:

Feedback data (e-mail, phone number*):

To

Legal name	Sofia University "St. Kliment Ohridski"
БЪЛГТАТ	000670680
Seat and registered office	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Address for correspondence	15 Tzar Osvoboditel Blvd., Sofia, 1504, Bulgaria
Phone number	(02) 9308 200
Web page	https://www.uni-sofia.bg/

I request the following personal data which you collect, process and store, provided by myself or third party, related to me, to be rectified as it follows:

Personal data, which shall be rectified:

.....

I request the mentioned personal data to be rectified as it follows:

.....

In case of violation of your rights under the abovementioned or under the applicable data protection legislation, you have the right to make a complaint to the Commission for Personal Data Protection as follows:

Legal name	Commission for personal data protection
Seat and registered office	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Address for correspondence	2 Prof. Tsvetan Lazarov Blvd., Sofia 1592
Phone number	02 915 3 518
Web page	www.cdpd.bg

Signature:.....