

Conditions of data protection

Tallinn University, considering individuals' privacy and personal data protection to be important and valuing the trust of a data subject, shall proceed with the processing of personal data from the following conditions of data protection:

1. Definitions and abbreviations

- 1.1. "Data subject" means an identified or identifiable natural person, whose personal data Tallinn University is processing, incl. students of degree studies or continuing education, conference participants, employees, service providers, webpage visitors, applicants.
- 1.2. "Personal data" means any information relating to the data subject, incl. name, personal identification number, contact details, computer's IP address.
- 1.3. "Processing of personal data" means any operations performed with personal data, incl. collection, retention, use, amendment, deletion.
- 1.4. "Controller" means a person which determines the purposes and means of the processing of personal data.
- 1.5. "Processor" means a person which processes personal data on behalf of the controller.
- 1.6. "Third party" means a person who is not a data subject, controller, or processor or an employee of such persons.
- 1.7. "Third country" means a country other than an EU Member State.
- 1.8. "Data Protection Inspectorate" means the authority that supervises personal data protection.
- 1.9. "TU" means Tallinn University, who is a legal person in public law.

2. Upon the processing of personal data, TU shall:

- 2.1. Process personal data, incl. transfer these to a third person and/or third country only for the purposes and to the extent determined by law, contract, consent or legitimate interest, adhering to all legislation governing data protection;
- 2.2. Ensure personal data protection via efficient organisational, physical and IT security measures and strict confidentiality and security rules, protecting personal data against any unwarranted use. Any information containing personal data has been declared as information meant for internal use only and shall be subject to access restrictions;
- 2.3. Process personal data on paper or in an information system. Personal data shall be retained according to the retention times specified in the list of documents. Any personal data that TU does not need any more, incl. due to the expiry of the retention time, shall be deleted;
- 2.4. Process personal data in accordance with the requirements established by TU for the processing of personal data. The purposes of the processing of personal data, data subjects, types of personal data and information on the disclosure/ transmission/ storage of personal data are set out in the overview of the processing of personal data. The information system, in which the personal data is processed and the locations established for documents, access restrictions and retention periods, are also set out in the TU's list of documents;
- 2.5. Enable access to personal data only for those employees of TU who have passed the relevant training and are authorised to process personal data only to the extent that is necessary for achieving the objectives of personal data processing;
- 2.6. Not issue personal data to any third persons, unless the obligation to issue personal data arises from law or the data subject has given his/her consent;

- 2.7. Disclose a certain amount of information and documents under the Public Information Act on its webpage. Upon restriction of access, section 35 of the Public Information Act shall be followed. Documents related to a data subject are, in general, subject to access restriction, in a public document register, the initials of the data subject are used instead of the name, the name of the document is indicated in a form which will not allow its detailed content to be assumed and the content of documents with access restrictions shall not be displayed. Access restrictions can be viewed in the list of documents;
- 2.8. Reply to a person's request in a way chosen by him/her either by e-mail or mail. Depending on the sensitivity of the issue, the reply shall be sent via an encrypted or a non-encrypted e-mail. A secure password may be used instead of encryption, provided that the password will be sent in another way and safely. If a person wants to receive the reply by post, the reply shall be sent either by ordinary or registered mail, depending on the sensitivity of the issue;
- 2.9. Process personal data upon the application of the data subject or third person (applicant) on the basis of a respective application. The applicant must be able to prove his/her identity and his/her right to receive data. In the event that TU is not convinced that the transfer of data is justified, no data will be issued. The application shall be accepted or rejected upon reasoned grounds within the term set forth by law. If there is a need to specify the application or if the processing of personal data is time-consuming, TU may extend the deadline for accepting the application, informing the applicant thereof;
- 2.10. Analyze before issuing a document mentioned in section 2.9., whether the document requested can be issued in an unaltered form or it must be processed in a way that information subject to access restrictions shall not enter into the possession of third parties;
- 2.11. Forward, upon the receipt of personal data from a data subject, him/her information regarding the controller, the name and contact details of its representative, if necessary, the contact details of the Data Protection Officer, the purpose of and legal grounds for the processing of personal data. If necessary, announce the intention of transmitting personal data to a third party and/or third country and provides information about the sufficiency of protection and the suitability of safeguards. The retention times or criteria for their determination will also be announced. Data subject will be informed regarding his/her right to request rectification, deletion, restriction of processing, and transmission of personal data, as well as the right to withdraw consent at any time and the right to submit a complaint to the Data Protection Inspectorate. If personal data is received from another source than the data subject, the data subject must be informed, in addition to the above, about the source of personal data.

3. In relation to the processing of personal data, the data subject:

- 3.1. May withdraw at any time the consent given for the processing of personal data, by submitting a respective request to the e-mail address indicated in section 3.10, without prejudice to the lawfulness of processing of personal data based on consent before its withdrawal;
- 3.2. May obtain from TU confirmation as to whether or not data concerning him or her are being processed. In the event of processing, the data subject may get information about the personal data processed, the purposes of their processing and their types. If data has been transferred to third parties and/or third countries, also information about it;
- 3.3. May request rectification of his/her inaccurate personal data, to have incomplete personal data completed, and to restrict the processing of personal data according to legislation;

- 3.4. May request deletion of personal data concerning him/her, unless TU or a third party has legitimate grounds for the processing of such personal data;
- 3.5. May request transmission of personal data only if it is technically feasible, i.e. if two systems are able to communicate securely with each other and the receiving system is technically capable of receiving incoming data;
- 3.6. May submit objections to the processing of personal data if it is carried out on the basis of the legitimate interest of TU or a third party. Unless it has been proven that the data is processed on compelling legitimate reasons which outweigh the interests, rights and freedoms of the data subject or if data is processed with the purpose of establishment, exercise or defence of legal claims;
- 3.7. May prohibit the processing of personal data for direct marketing purposes, including profiling, to the extent that it is related to such direct marketing;
- 3.8. has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, unless required for the conclusion or execution of a contract between the data subject and TU or if performed under law or the consent of the data subject;
- 3.9. May receive information regarding a breach related to his/her personal data, when such breach is likely to result in a high risk to his/her rights and freedoms. TU must explain in a respective notice in clear and plain language the nature of the breach and submit the name and contact details of the Data Protection Officer or other competent person or describe the potential consequences of the breach or indicate the measures taken/planned to mitigate the possible adverse effects.
- 3.10. May contact TU using the following contact details if he/she has any questions concerning the processing of his or her personal data or in order to file complaints:
address: Tallinn University, Narva mnt 25, 10120 Tallinn
telephone: 372 640 9101
e-mail: tlu@tlu.ee
The contact details of the Data Protection Officer:
telephone: +372 640 9102
e-mail: andmekaitsespetsialist@tlu.ee
- 3.11. In the event that the data subject finds that TU has violated his/her rights upon personal data processing, he/she has the right to refer at any time to the Data Protection Inspectorate or the court for the protection of his/her interests.

Tallinn University shall retain the right to unilaterally amend these conditions of data protection at any time.