

APPROVED BY  
Order No. A-467 of the Rector of  
Kaunas University of Technology of  
26 July 2019

**REGULATIONS ON THE PROCESSING OF THE PERSONAL DATA USED IN THE  
IMPLEMENTATION AND ADMINISTRATION OF THE STUDY PROCESS OF THE  
STUDENTS OF KAUNAS UNIVERSITY OF TECHNOLOGY**

**CHAPTER I  
GENERAL PROVISIONS**

1. The Regulations on the Processing of the Personal Data Used in the Implementation and Administration of the Study Process of the Students (hereinafter – Regulations) of Kaunas University of Technology (hereinafter – University) set out the regulations on the processing and storage of the personal data of the students, as data subjects, used for the purposes of the implementation and administration of the study process, the purposes of the processing, the legal basis and transfer to the third parties, the obligations of the data controllers, the rights of the data subjects and the procedure of their implementation.

2. The Regulations only regulate the processing of the personal data required for the implementation and administration of the study process. The Regulations are not applied to the student accommodation services provided by the University at the dormitories, the services provided at the University's Sports and Wellness Centre and other services provided by the University unrelated to the implementation and administration of the study process.

3. The data of all the University's students and unclassified students – present (currently studying) and former (no longer studying) – who have provided their personal data to the University based on the contractual and other legal relations are processed at the University. The data processing for the persons who have applied but have not been admitted to studies is regulated by the Regulations on the Admission of Students to Kaunas University of Technology.

4. The Regulations are prepared in accordance with the Regulation of the European Parliament and Council (EU) 2016/679 "On the Protection of Individuals with Regard to the Processing of Personal Data and on the Free Movement of Such Data, and Repealing Directive 95/45/EC" of 27 April 2016 (hereinafter – GDPR), the Law on the Legal Protection of Personal Data of the Republic of Lithuania (hereinafter – LPPD), the Regulations on the Personal Data Processing at the University approved by the Rector of the University and the provisions of other regulations and legislation of the University regulating the protection of data.

5. The key provisions of the University's Regulations on the Processing of Personal Data are introduced to the students against the acknowledgement of receipt (printed or electronic option) before they make a learning agreement; the signed data processing regulations and a learning agreement are constantly available in the student's account at the University's Academic Information System (hereinafter – AIS). The general information on the processing of the personal data of the University's students is published on the University's website; the detailed information on the personal data processing in the implementation and administration of the study process is available to the students on the University's student intranet.

6. The assigned data protection specialist is responsible for the protection of personal data at the University; the specialist can be contacted by email [privacy@ktu.lt](mailto:privacy@ktu.lt) or by the address K. Donelaičio str. 73-110, Kaunas.

## **CHAPTER II PROCESSED PERSONAL DATA**

7. The personal data of the students are processed in the implementation and administration of the University's study process based on the following key principles: purpose limitation, validity, accuracy, integrity and confidentiality, fairness and transparency, data minimisation and limitation of the storage period. In the processing of personal data, proper security of personal data is guaranteed by the use of the appropriate organisational and technical measures.

8. The University processes the personal data provided by the students, transferred by the third parties under the procedure stipulated by the legislation or on the contractual basis and collected during the implementation and administration of the study process. The data provided by the students are entered by an employee conducting their admission, an administrator of studies or other authorised employee of the University.

9. The following data of the students are processed for the purposes specified in Chapter III of the Regulations in the implementation and administration of the University's study process:

9.1. identification data: name, surname, personal identification code, date of birth, gender, citizenship, country of origin, photograph (if provided by a student), curriculum vitae (CV), title, number, date of issue, validity of the personal identity document, email address provided by the University, user name in the information systems of the University, number and bar code of the Lithuanian student identity card, status of an expatriate/foreigner of the Lithuanian descent, etc.;

9.2. contact data: place of residence, telephone number, personal email address, contact information of a close relative (if provided by a student), etc.;

9.3. data of a socially disadvantaged person, a disabled student or a person with special educational needs (if provided by a student);

9.4. data of the previously acquired education that is the basis for the admission to studies: school, date of issue, code, serial number of the document proving the acquired education, date and number of the document of recognition of the education acquired abroad, entrance score, results of the state examinations, etc.;

9.5. data of the changes in a student status: contracts with the University, student status, legal basis for a suspension/termination of studies, student's applications and supporting documents, etc.;

9.6. data of the study programme and plan: academic department, cycle of studies, title and code of the study programme/science field, period of studies, language of the programme, form of studies, year of studies, semester, group, chosen specialisation of the programme, title of the dissertation, study modules, data of the individual study plan, etc.;

9.7. Learning outcomes: number of the acquired study credits, number of the academic debts, semester's weighted grade point average, evaluations of the intermediate and final assessments of the study modules, results of the attestations, data of the inclusion of the results acquired at another institution, etc.;

9.8. works of studies: answers to the written assessments, test results, written works, final projects, doctoral dissertations, dissertation abstracts, public presentations and defences of the works of studies of the students, statements in writing, in audio or video form in the e-learning environment, etc.;

9.9. data certifying the acquired learning outcomes: title, serial number of the diploma, date of issue, serial number of the diploma supplement, year of graduation, qualification degree, passed examinations and credits, academic certificate of the learning outcomes, etc.;

9.10. logs of the learning activities: the actions performed in the University's information systems, statistical data, etc.;

9.11. data of the study timetable: type of the class, type, form, time, location, address of the final assessment, name, surname of the invigilator of the final assessment, names and surnames of the members of the examination commission, etc.;

9.12. data certifying the attendance in classes: attendance data, notifications of the systematic absence, copies of the documents justifying the absence, etc.;

9.13. mobility data: the institution that the student visited, sources for financing of the studies, internship and traineeship, dates of the beginning and end, number of the acquired credits, source for financing of the trip, etc.;

9.14. data of the tuition fees: nature of the financing of studies, its sources, price of the study programme, price of the study credit, receipts for payments, number of the bank account (if provided by a student), etc.;

9.15. data of the allocated financial support: requests and supporting documents, type and amount of the scholarship/support, payment period, data of the loan, etc.

10. Other personal data of the students not listed in the categories of data specified in Paragraph 9 of the Regulations are processed by the individual consent of the students.

11. The data of the students are processed automatically and non-automatically.

12. The data of the students are stored in the University's information systems (AIS, Library IS, electronic learning environment Moodle, Adobe Connect, Office365, etc.), personal files of the students and other locations stipulated by the University's legislation.

13. The data required for the implementation and administration of the study process are stored for the periods set out by the University's Rector (in the documentation plan, a list of the documents required to be stored in the student's personal file and other documents regulating the study process). The documents and data stored in the student's personal file and AIS are classified as follows:

13.1. Short-term storage – stored during the period of studies and within 1 year after the end of studies;

13.2. Long-term storage – stored during the period of studies and within 50 years after the end of studies.

### **CHAPTER III PURPOSES OF PERSONAL DATA PROCESSING**

14. The personal data used in the implementation and administration of the study process of the students are processed for the following purposes:

14.1. making and implementation of the learning agreement;

14.2. implementation of the study programme and individual study plan;

14.3. accounting of the learning outcomes;

14.4. accounting of the tuition fees;

14.5. distribution of financial support;

14.6. mobility administration;

14.7. making of the study timetables;

14.8. preparation of the study documents;

14.9. provision of the information related to the study process to the students;

14.10. transfer of the data to the state registries and state institutions;

14.11. protection of the vital interests in case of illness or accident.

15. Personal data are processed based on the following legal basis specified in GDPR:

15.1. article 6(1(e)) (data processing is required for the implementation of the contract that the data subject is a party of, or the actions to be performed at the request of the data subject before making the contract) – contractual/substantive legal basis;

15.2. article 6(1(e)) (data processing is required to fulfil the legal obligations imposed on the data controller), orders of the Minister of Education and Science of the Republic of Lithuania (provisions of the Student Register, Guidelines for the Preparation, Production, Accounting, Registration and Issue of the Mandatory Forms for Diplomas, Diploma Supplements and Certificates, provisions of the Register of Diplomas and Certificates), resolutions of the Government of the Republic of Lithuania (regarding the fees), orders of the director of the State Studies Foundation (regarding the fees), etc.) – legal obligation;

15.3. article 6(1(e)) (data processing is required for the protection of the vital interests of the data subject or another natural person);

15.4. article 6(1(e)) (data subject gave consent for his/her personal data to be processed for one or several specific purposes);

15.5. article 6(1(e)) (data processing is required for the performance of the task performed for the public interest) – statistical analysis of the aggregated data for the improvement of the quality of studies, etc. – public interest;

16. The personal data of the students can be provided to the following institutions under the procedure stipulated by the legislation during the period of studies and within one year after the end of the studies according to the classification of the students in a certain data group:

16.1. Ministry Education, Science and Sport of the Republic of Lithuania;

16.2. Centre of Information Technologies in Education (Student Register, Register of Diplomas and Certificates);

16.3. Lithuanian Academic Electronic Library;

16.4. State Studies Foundation;

16.5. Budget Department under the Ministry of Finance of the Republic of Lithuania;

16.6. Department for the Affairs of the Disabled under the Ministry of Social Security and Labour;

16.7. Education Exchanges Support Foundation;

16.8. Migration Department under the Ministry of the Interior;

16.9. another school of higher education;

16.10. institutions of the foreign countries (embassies and consular offices);

16.11. law enforcement institutions;

16.12. other institutions in accordance with the legislation of the Republic of Lithuania.

## **CHAPTER IV OBLIGATIONS OF THE DATA CONTROLLERS**

17. The administrative and academic employees of the University have the right to process the personal data of the students. The rights to access the University's information systems and student data are provided by the order of the Vice-Rector for Studies of the University under the set procedure and according to the functions stipulated by the job descriptions of the employees:

17.1. the administrator's access rights to the data of the students of the academic department in AIS with a possibility of entering and editing the data are provided to an individual under the following procedure: an administrative employee applies to the Department of Academic Affairs regarding the provision of the access rights; he/she submits a request regarding the user registration and a commitment to protect the personal data of the students; the director of the Department of Academic Affairs approves the request and provides an access to AIS;

17.2. the employee's access rights to the data of the students of a specific department or group in AIS without a possibility of editing are provided to the groups of employees under the following procedure: an employee or a group of employees submits (submit) a request (requests) regarding the

provision of the access rights and the commitments to protect the personal data of the students; the director of the Department of Academic Affairs approves the request and provides an access to AIS.

18. While processing the personal data of the students, the University's employees guarantee that personal data:

18.1. are processed following these Regulations, GDPR, LPPD and other regulations and legislation of the University regulating the protection of data;

18.2. are not processed for the purposes incompatible with the ones stipulated before the collection of personal data;

18.3. are processed accurately, fairly and lawfully;

18.4. are accurate and complete; inaccurate data have to be corrected or destroyed;

18.5. are processed according to the organisational and technical data security measures;

18.6. are not transferred to the third parties unless the legislation stipulates otherwise;

18.7. are destroyed after the end of the personal data storage period.

## **CHAPTER V RIGHTS OF THE DATA SUBJECTS**

19. The students, as data subjects, have the following rights stipulated by the legislation:

19.1. the right to get acquainted with their personal data processed by the University – to get the University's confirmation if their personal data are processed, to get acquainted with their processed data and the information on the purposes of their data processing, the sources of the data, the recipients of the transferred data, the data processing period, etc. The students can apply to the University's data protection specialist by email [privacy@ktu.lt](mailto:privacy@ktu.lt) regarding the implementation of this right;

19.2. the right to correct their personal data if the information processed by the University is inaccurate or incomplete. The students can correct certain data in AIS; they can apply regarding the other data to the academic department of their studies;

19.3. the right to delete or revoke their personal data when such data were provided in AIS by the student and the data are not required for the implementation and administration of the study process. A student can delete the data at his/her account in AIS;

19.4. the right to submit a complaint if he/she suspects the University processes his/her personal data in violation of the legislation regulating the protection of data. The students can submit a complaint to the University's data protection specialist by email [privacy@ktu.lt](mailto:privacy@ktu.lt). If the student and the University fail to solve the problem by mutual efforts, the student has the right to submit a complaint to the State Data Protection Inspectorate by email [ada@ada.lt](mailto:ada@ada.lt).

20. Aiming to implement their rights, the data subjects submit a free-format request or complaint to the University's data protection specialist by email [privacy@ktu.lt](mailto:privacy@ktu.lt) or by the address K. Donelaičio str. 73-110, Kaunas.

21. A request or complaint has to be legible, specifying the name, surname and contact data of the data subject. A request is submitted with a personal identity document or a copy thereof. A request or complaint is not examined if it is not submitted under this procedure. A data subject can implement his/her rights personally or via the notarised representative.

22. The University provides the replies to the requests or complaints of the data subjects within 30 (thirty) calendar days after the date of the receipt of the request or complaint at the latest. In exceptional cases, when more time is required for the examination of the request or complaint or the preparation of information, the reply term can be additionally extended for 60 (sixty) calendar days, informing the data subject about such an extension.

## **CHAPTER VI FINAL PROVISIONS**

23. The Regulations are published on the University's student intranet; their key provisions are published on the University's website.

24. In all the cases related to the protection of the data used in the implementation and administration of the study process not specified in the Regulations, the decisions are made by the University's data protection specialist.

25. The Regulations can be amended, supplemented or repealed by the order of the University's Rector.