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# Data Protection

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## **Management of Student Property and Personal Data**

The college receives from the student personal data and other data used to ensure traceability and to enable the provision of college services such as, but not limited to, registration documents, medical examination certificates, dissertations, etc.

In this case, data and documents provided by the student are checked to ensure their suitability and correctness, as well as the adequacy of the data for the execution of the requested task. If problems are identified, the student is promptly informed to take the appropriate corrective actions.

Any documents and data received by the college from the student are recorded in box files or electronic records and are kept safely, as provided by the college procedures and legislation

It should be stated at this point that the personal data of college students are not disclosed to third parties and are in no way publicized or in any way exploited. This information is only used to the extent that it is strictly necessary for the college to fulfill the terms and conditions of the services provided.

The college ensures by appropriate measures the exclusion of loss, damage or destruction of data and property of students placed under its custody or possession. In the event of material or data being destroyed or forfeited under the responsibility of the college or communicated without the consent of the person concerned, the management, through its competent bodies, shall inform the person concerned and arrange for compensation for any damage that may have been caused.

In addition, the college, through the operation of the library and in particular the lending process, also manages the material of other libraries.

## **Handling, Storage, Preservation and Delivery**

All data relating to the service provided by the college to its students and directly related to each student's course (e.g. grades) are managed and maintained safely,

both in databases, as well as physical records, and before they are delivered to the students, the necessary checks are carried out according to the processes included in the Quality Management System

The Directors and the Heads of Departments ensure that the above practices are followed by all personnel in their area of responsibility. All college staff follows the rules and best practices for handling and safe retention of data in the implementation of processes.

The methodology, responsibilities and documents required are covered in more detail in documented manuals, regulations, procedures and guides:

- Administration Procedures Manual
- Internal Regulations of the School
- Regulation and Research Services Procedures
- Study Guide of the School

## **Privacy Policy of the College's Website**

### ***Personal Data***

As defined within the context of GDPR (General Data Protection Regulation) is any data that can be directly or indirectly related to a natural person (data subject). Personal data includes any identifiable personal data that can connect personal data to a data subject e.g. name, citizen Id, phone number, email address etc.

In the course of using this Website, a User may choose to provide information through online forms, email or other electronic means. Any Personal data submitted by the Users will be used by CBS Cyprus only for the purpose(s) indicated in this document and/or the content of this Website.

In addition, this Website uses cookies provided by trusted third parties.

For each case regarding the collection and processing of Personal data, detailed information is provided in the corresponding sections of this Privacy Policy.

### ***Lawful bases for processing data***

CBS may process Personal Data relating to Users if one of the following applies:

- Consent: The data subject has given consent to the processing of personal data for one or more specific purposes e.g. Use of personal information while processing data to communicate with prospective students. Although at this stage there is no implied agreement with these data subjects, data subjects give their consent to communicate with them by

completing, for example, the application for interest indicating their intention to come to the college.

- **Contract:** Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract e.g. Academic Processing for students.
- **Legal obligation:** Processing is necessary for compliance with a legal obligation to which the controller is subject e.g. share personal information if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to protect against harm to the rights, property or safety of the college, our users or the public as required or permitted by law.
- **Public task:** Processing 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 e.g. Providing student statistical information to the Cyprus Ministry of Education and Culture.

### ***The purposes of processing***

Primarily the Data concerning the User is collected to allow CBS to facilitate Users with their enrolment as students in College's programs of study, to communicate with a user or third person or organization and provide information about the programs and/or the services of the College as well as for Analytics purposes.

Users can find further detailed information about the purposes of processing as well as the specific Personal Data used for each purpose in the respective sections of this document.

### ***Collection of Personal Data***

Personal Data is collected as follows:

#### Use of cookies

CBS uses cookies provided by trusted third-parties. Cookies are tiny files downloaded to the User's device, to improve the User's experience. The following section details which third-party cookies you might encounter through this site.

#### Google Analytics

This Website uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping CBS to understand how Users use the site and ways that CBS can improve Users' experience. In this case the information is collected automatically and these cookies may track things such as internet protocol (IP) addresses, browser type, internet service provider (ISP),

referring/exit pages, platform type, date/time stamp time spend on the Website, Pages visited.

For more information on Google Analytics cookies, see the official [Google Analytics page](#) - [Privacy Policy](#) - [Opt Out](#).

Contact forms

Contact and Request of Interest forms (this Website)

By filling in the Contact and/or Request of Interest forms with their Data, the User authorizes this Website (the User's consent is required for the processing of this data, therefore the Users will be referred to CBS's Privacy Policy and asked to grant their consent prior sending a form) to use these details to reply to requests for information, quotes or any other kind of request as indicated by the forms' header.

Personal Data collected: First name, Last name, Country, Email address and Phone number.

### ***The rights of Users***

Users may exercise certain rights regarding their Data processed by CBS.

In particular, Users have the right (a) to access, rectify, or erase their personal data we have collected about them through the Service. Users also have the right (b) to data portability and the right (c) to restrict or object to our processing of personal data we have collected about them through the Service. In addition, Users have the right (d) to ask not to process their personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by them. Users may (e) withdraw their consent at any time for any data processing we do based on consent they have provided to us.

To exercise any of these rights, contact us as set forth in the section above entitled "Owner contact information" and specify which right you intend to exercise. These requests can be exercised free of charge and will be addressed by CBS as early as possible and always within one month. We may require additional information to allow us to confirm the User's identity.

If Users have any issues with our compliance, they have the right to lodge a complaint before their competent data protection authority.

### ***Location/Data transfer***

Data Processing activities are currently carried out at CBS's main offices as set forth in the section above entitled "Owner contact information".

Users' personal Data will only be transferred to countries outside the EU only in cases where (a) it is required by law or (b) users granted us the permission and/or instructed us to do so.

In the case where service providers of a third country are used, CBS will ensure to take all the necessary measures to provide appropriate safeguard measures so that these service providers will comply with the GDPR.

Any transfers to parties located outside the European Union will be in accordance with the GDPR and applicable local legislation as amended from time to time.

### ***Data retention***

The personal data a User provides to CBS will only be retained for as long as it is required to fulfil the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, enforce our agreements or upon order of an authority.

### ***Data Protection***

CBS takes every necessary and appropriate measures (such as website scans for security holes and known vulnerabilities, use of secured networks only accessible by CBS appropriate officials who are granted with special privileges in order to have access) to ensure protection and security and/or minimize the risk of personal data from unauthorized access, alteration, disclosure or destruction.

### ***Service Providers***

CBS engages third-party companies and/or individuals to perform services on CBS behalf (e.g. software maintenance services, advertising serving technologies, e-mail service providers, database management and other services). These third parties have access to your information so that they may perform these tasks on behalf of CBS and they are prohibited by CBS from using or disclosing your information for any purpose other than to provide their support, except to the extent required by law.

### ***Accessing this website and creation of log files***

Like many Website operators, this Website as well as any third-party services may collect information that a browser sends whenever a User visits this Website ("Log files").

The temporary storage of data and log files is lawful according to Art. 6 (1) General Data Protection Regulation.

The temporary storage of the IP address by the system is necessary to enable this Website to be delivered to the user's computer. For this the IP address of the user must remain stored for the duration of the session. The data is stored in log files to ensure the functionality of the website. In addition, the data serves us to optimize the website and to ensure the security of our information technology systems.

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

If the data is stored in log files, this is the case after seven days at the latest. Further storage is possible. In this case, the IP addresses of the users are deleted or removed, thus, the link of the data to any individual is no longer possible.