**MTÜ Tartu Üliõpilasküla**                                                 Version 191031
Procedure: MTÜ Tartu Üliõpilasküla privacy policy          Approved: 31 October 2019, Directive No. 44
Owner of document: Quality Specialist                              Valid from: 31 October 2019

# MTÜ TARTU ÜLIÕPILASKÜLA PRIVACY POLICY

MTÜ Tartu Üliõpilasküla (registry code 80012342, seat Narva mnt 25, Tartu 51009) (hereinafter referred to as the Student Village) is committed to protecting the privacy of its staff and customers. It has therefore prepared this Privacy Policy describing the processing of personal data.

## 1. DEFINITIONS

**Data subject** means a natural person whose personal data are processed.

**Customer** (including data subject) means every natural person who uses or has expressed their wish to use the accommodation and related services provided by the Student Village.

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

**Processing** means any operation which is performed on personal data: collection, documentation, organisation, consultation, storage, adaptation and alteration, transmission, erasure or destruction.

## 2. PROCESSING OF PERSONAL DATA OF CUSTOMERS (TENANTS)

### PURPOSES OF AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

2.1. When filling in a housing application on the Student Village website www.campus.ee or www.studenthostel.ee, the customer confirms that they are aware of the use of their personal data for the purpose of entering into a tenancy contract and that they have read the Privacy Policy of the Student Village.

2.2. The Student Village limits its collection of personal data to the minimum necessary for meeting the purposes of processing.

2.3. The Student Village processes the customer's personal data for the following purposes:

    2.3.1. processing of housing applications, reserving and approving places

    2.3.2. preparing and entering into tenancy contracts

    2.3.3. submitting and settling invoices

    2.3.4. customer communication, including contacting in urgent matters

    2.3.5. processing of access cards and granting other rights to use services

    2.3.6. performing obligations arising from legislation

    2.3.7. improving service

    2.3.8. defending the rights of the Student Village

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## COLLECTION AND COMPOSITION OF PERSONAL DATA

2.4. The Student Village mainly receives the personal data of its customers directly from the customer when the customer submits a housing application through the website of the Student Village.

2.5. The Student Village processes the following personal data entered in the housing application:

2.5.1. **Identification data**: first name and surname, gender, personal ID code, date of birth (dd/mm/yyyy), nationality

2.5.2. **Contact details**: telephone number, home address (street, building number, apartment number, city, county, country, postal code), e-mail address, first name and surname and telephone number of contact person

2.5.3. **Academic details**: educational institution, field of study, year of study

2.5.4. **Bank details**: account number (IBAN), SWIFT (BIC); for international students and international guest students also: name of bank, account holder, address of account holder

2.6. The Student Village processes the following personal data of customers supplied by customers to the Student Village on a voluntary basis:

2.6.1. **Other personal data of customer**: registration number of car and/or bicycle, lifestyle (morning person/evening person, smoker/non-smoker), data supplied in the customer satisfaction questionnaire, other comments supplied in the housing application, such as the name of the preferred roommate.

2.7. The Student Village is only responsible for the personal data sought from the customer that are necessary for meeting the purposes of processing. Other data supplied voluntarily is of no importance and the Student Village has no connection to such data.

## STORAGE OF AND ACCESS RIGHTS TO PERSONAL DATA

2.8. Access to personal data for the purposes of processing and amendment is only granted to Student Village employees that need such access in their work, and the personal data of all Student Village customers are regarded as confidential.

2.9. A customer can view the personal data collected on them through the e-kyla information system and through an inquiry to the Student Village.

2.10. The Student Village stores its customers' personal data for as long as is deemed necessary in the view of the Student Village for meeting the purposes of processing or as prescribed by law.

2.11. The Student Village does not issue or transfer personal data to any third parties without the prior consent of the customer unless the relevant obligation arises from law. Regardless of access restrictions, in the events prescribed by legislation, the

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Student Village issues personal data at the request of authorities (e.g. law enforcement authorities) or to defend its rights.

2.12. The Student Village is not liable for the activities of third parties.

## 3. PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

### LEGAL BASIS FOR AND PURPOSES OF PROCESSING, COMPOSITION

3.1. The Student Village limits its collection of job applicants' personal data in the recruitment process to the minimum necessary for meeting the purposes of processing.

3.2. If an applicant has submitted the data required for application (for the purpose of hiring), the Student Village assumes the applicant's consent to the processing of their personal data in the recruitment process.

3.3. The Student Village collects and processes the following personal data on job applicants in the recruitment process:

3.3.1. **Identification data:** first name and surname

3.3.2. **Personal contact details:** telephone number, e-mail address

3.3.3. **Data for assessing the suitability of the applicant:** qualification data, such as education, work experience, continuing training, foreign language skills, computer skills

3.3.4. **Suitability assessment tests where necessary:** personality test, intellectual abilities test

3.3.4.1. A personality test and/or intellectual abilities test is taken if the applicant has given their relevant consent in the testing environment. The Student Village may receive additional personal data on the applicant from the conductor of the test through the interpretation of the test results.

3.3.5. **Contact details of references:** first name and surname, telephone number, e-mail address.

3.3.5.1. The Student Village assumes the applicant's consent to contact the references listed by the applicant. The Student Village further assumes that the references have consented to the submission of their data and that they can be contacted by the Student Village.

3.4. In the recruitment process, the Student Village may collect additional data on job applicants from public sources (social media networks, websites, public registers, etc.).

3.5. The Student Village is only responsible for the personal data that are necessary for meeting the purposes of processing. Other data supplied voluntarily by the applicant is of no importance and the Student Village has no connection to such data.

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STORAGE OF AND ACCESS RIGHTS TO PERSONAL DATA

3.6.   Access to applicants' data is restricted and the application documents of applicants are only accessed in the recruitment process by the employees involved in the process. These documents and the personal data contained in them are not disclosed to third parties.

3.7.   The Student Village may store the data of applicants not selected for the job and use such data for making job offers in the future, subject to the applicant's specific consent. Human resources specialists request such consent by e-mail.

3.8.   The resumes of unsuccessful candidates are stored (subject to consent) for a term of one year after notifying the applicant that they were not selected. The Student Village does not store other resumes.

## 4.   PROCESSING OF PERSONAL DATA OF STAFF

4.1.   The Student Village processes the following personal data of its staff under employment contracts and to meet its obligations under applicable laws and regulations:

    4.1.1.   **Identification data:** first name and surname, personal identification code

    4.1.2.   **Contact details for signing and performing the employment contract:** telephone number, e-mail address, home address (postal address)

    4.1.3.   **Qualification and continuing professional development data:** education, work experience, continuing training, other skills (e.g. foreign language skills, computer skills).

        4.1.3.1.   Education data is also necessary for granting study leave

    4.1.4.   **Payroll data:** bank account number, application to calculate the minimum wage exempt from income tax, pension information

    4.1.5.   **Family and social data for granting holidays and/or paying benefits:**

        4.1.5.1.   **Childbirth allowance:** birth certificate(s) of child (children)

        4.1.5.2.   **For granting child-related leave:** children's details (first name and surname, personal identification code)

        4.1.5.3.   **For paying death grants:** death certificate of the person close to the employee

    4.1.6.   **Special categories of personal data (data concerning the employee's health condition):** conclusions of medical examinations, data on occupational accidents and occupational diseases, health certificates (submitted before 2017)

    4.1.7.   **Data required for the employment certificate**: photo, first name and surname, job title

4.2.   Photos of employees are posted on the website of the Student Village only with the consent of the employee.

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## 5. PROCESSING OF PERSONAL DATA IN THE USE OF SURVEILLANCE CAMERAS

5.1.  Surveillance cameras are used on the Student Village premises to protect (the security of) assets and persons.

5.2.  Under tenancy contracts, contractual partners are allowed to invite guests to the premises owned by MTÜ Tartu Üliõpilasküla. Undefined third parties are thus allowed access to the premises of MTÜ Tartu Üliõpilasküla. Therefore, the general premises of MTÜ Tartu Üliõpilasküla are regarded as public places.

5.3.  Surveillance cameras are used subject to Section 11 (Processing of personal data in public places) of the Personal Data Protection Act, pursuant to which:

5.3.1.  personal data are processed so that data subjects have been notified thereof in a manner that allows them to understand the fact that audio or visual material is being recorded.

5.4.  Surveillance cameras have been installed on the principle of the minimum necessary, and the collected data is used and processed solely for the purpose for which it is collected.

5.5.  The location of surveillance cameras is based on a general risk analysis or a specific risk assessment of the situation at the particular moment.

5.6.  Surveillance cameras are only used if other measures are insufficient to control risks.

5.7.  Persons are notified of the use of surveillance cameras by signs on the exterior doors of the student housing (an image of a camera and the text "video surveillance"), which, for data processing purposes, substitute for the data subject's consent pursuant to Section 11 of the Data Protection Act.

5.8.  The real-time image from surveillance cameras is monitored by Student Village employees on a sample basis or in the materialisation of an actual threat.

5.9.  The surveillance cameras used by the Student Village (including video recordings, camera views, terms for storage of recordings, access rights to recordings and real-time video images) are mapped for each student house *Valvekaamerad üliõpilaselamutes.xls*.

5.10.  The Student Village transmits video recordings to third parties (e.g. law enforcement authorities) only on the basis of an official written request and/or an obligation arising from laws.

5.11.  The recordings are stored according to the capacity of the storage system, but no longer than two weeks.

## 6. VISITING STUDENT VILLAGE WEBSITES

6.1.  The Student Village collects and stores the following data obtained from website visits:

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6.1.1. IP address of the computer or computer network used

6.1.2. time (time, date, year) and place (country) of visit

6.2. The data specified in clauses 6.1.1-6.1.2 is used to compile visit statistics for the purpose of developing its website and making it more convenient for customers. The Student Village will not link these data to customer identification data.

## 7. RIGHTS OF DATA SUBJECT

7.1. **The data subject has the right to:**

7.1.1. examine the data collected about them. The Student Village may request additional information from the data subject for identification purposes in order for the data subject to examine their personal data

7.1.2. request the correction of any incorrect data collected about them if the data has changed or is otherwise inadequate. The data subject may further request the supplementation of incomplete personal data

7.1.3. withdraw their consent at any time if processing their personal data is based on consent. This does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

## 8. CONTACT

8.1. You can ask the data controller for explanations about the processing of personal data by writing to info@campus.ee.

8.2. Data Protection Inspectorate (e-mail: info@aki.ee, telephone: 627 4135).