

PRIVACY POLICY OF THE MEDICAL UNIVERSITY OF APPLIED AND HOLISTIC SCIENCES

- I. FOREWORD
- II. INFORMATION OBLIGATION
- III. THE ADMINISTRATOR OF PERSONAL DATA
- IV. PERSONAL DATA
- V. HOW DO WE COLLECT INFORMATION
- VI. HOW WE PROCESS PERSONAL DATA
- VII. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA
- VIII. HOW WE DISCLOSE PERSONAL INFORMATION
- IX. RIGHTS OF NATURAL PERSONS
- X. SECURITY OF PERSONAL DATA
- XI. PERSONAL DATA RETENTION PERIOD
- XII. TRANSFER OF DATA ABROAD
- XIII. COOKIES
- XIV. PERSONAL DATA PROTECTION OFFICER
- XV. SUBMITTING A COMPLAINT TO THE REGULATORY AUTHORITY

I. FOREWORD

This „Personal Data Processing Notice” (Notice) describes how we work with your Personal Data, how we protect it, and the choices you can make with respect to that Personal Data.

II. INFORMATION OBLIGATION

- 1. This document serves to fulfill the obligation to provide information in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (GDPR).
- 2. We would like to clarify that in accordance with art. 13 GDPR information is provided when collecting data from a data subject.
- 3. We would like to clarify that in accordance with art. 14 GDPR information is provided when personal data is obtained by means other than from the data subject.

III. THE ADMINISTRATOR OF PERSONAL DATA

The Administrator of your Personal Data, i.e. the entity responsible for collecting, using and disclosing your Personal Data is: the **Medical University of Applied and Holistic Sciences**, Kasprzaka 49, 01-234 Warsaw, NIP 5272551490, REGON 140942044, entered into the register of non-public universities under number 339 (hereinafter: the University)

1. If you have any questions about this Notice or wish to exercise any rights, please contact us at the following [e-mail address: amh@amh.edu.pl](mailto:amh@amh.edu.pl) or by correspondence to the address indicated above.

IV. PERSONAL DATA

1. Categories of Data Subjects:

- university employees
- student community
- university associates
- principals and contractors of the University
- students, listeners and candidates
- Other website visitors

2. „Personal data” is data that allows the direct or indirect identification of natural persons.

3. The personal data we collect or may collect includes:

- first name(s),
- surname(s)
- first name(s) of family members
- surname(s) of family members
- gender
- address
- address of residence, stay or correspondence with a postal code
- date of birth
- PESEL or other ID number
- NIP
- and the number of the identity card or passport
- number of other documents,
- citizenship
- employment-related circumstances (including period of employment, place of work, professional experience)
- data on education, qualifications, specializations, professional connections (e.g. membership in professional self-governments), publications, competences and other professional achievements.
- phone number, including mobile phone
- email address
- fax number
- information on the state of health
- preferred language
- photo/image

- hobbies
- communications, including information on reporting adverse reactions
- financial and banking data, in order to pay remuneration for services or reimbursement of expenses
- business, travel, accommodation and subsistence expenses
- position, employment department
- responsibilities
- absence data (vacations, sick leave, rehabilitation, training, other)
- information about penalties, rewards and other information required under the Labour Code
- other data related to the scope of the contract and entrusted matters

V. HOW WE COLLECT PERSONAL DATA

We collect Personal Data:

1. During direct contacts, via electronic means of communication and:
 - from signed contracts
 - from phones
 - from signed declarations and consents
 - from other signed documents and surveys
 - during participation in programs, activities, industry events, educational meetings, fairs
 - in connection with inquiries or messages addressed to the University
 - from companies providing IT services
 - from publicly available sources
 - from marketing partners

VI. HOW WE PROCESS PERSONAL DATA

Operations or set of operations performed on Personal Data:

- collecting
- recording
- organizing
- arranging
- storing
- adaptation or modification
- downloading
- browsing
- exploitation
- disclosure

- transfer
- matching or merging
- restricting
- deleting or destroying

VII. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

1. The University processes Personal Data only to the extent and for the purpose of:
 - a) performing duties as an Employer, in accordance with art. 6 sec. 1 letters a, b, c, f of the GDPR and art. 9 sec. 2, letter b, h of the GDPR
 - b) enrolment for studies, the recruitment process and the organization of the full educational process, including referral for clinical exercises, internships, etc., you provide the University with your personal data. The basis for the processing of your data in this case is your consent to contact the Administrator in connection with the offer of services by the University, i.e. art. 6 sec. 1 letter a of GDPR. In turn, the processing of your data in order to answer the questions sent and conduct further correspondence results from the legitimate interest of the Administrator (art. 6 sec. 1 let. f RODO. After the end of the contact or process, your personal data will be processed on the basis of the Controller's legitimate interest, which is the archiving of correspondence with you, i.e. pursuant to art. 6 sec. 1 point f of the GDPR;
 - c) interaction and cooperation within the framework of contractual relations, or on the basis of consent, in accordance with art. 6 sec. 1 letter b
GDPR, or on the basis of the consent of art. 6 sec. 1 letter a of GDPR
 - d) statistical or administrative, in accordance with art. 6 sec. 1 letter f GDPR
 - e) verification for the purposes of counteracting corruption and assessing the security of cooperation in accordance with art. 6 sec. 1 letter f GDPR
 - f) conducting training and ensuring quality control, including internal and external audits in accordance with
art. 6 sec. 1 letter b, f of GDPR
 - g) fulfillment of anti-corruption and transparency obligations in accordance with art. 6 sec. 1 letter f GDPR
 - h) ensuring the protection of rights, privacy, security, as well as the property of the University in accordance with art. 6 sec. 1 letter f GDPR
 - i) providing marketing information and educational materials (digitally or otherwise) that can be adapted to the area of professional specialization and interests, subject to your consent, in accordance with art. 6 sec. 1 letters a and f of the GDPR
2. Interaction and cooperation with you includes:
 - a) responding to your inquiries and requests
 - b) implementation of contracts concluded with you

- c) sending you information related to the implementation of contracts and documenting our interactions with you
- d) creating and maintaining the University's database
- 3. The provision of educational services that include:
 - a) enrollment for studies
 - b) implementation of the learning process
 - c) processing of applications
 - d) issuing decisions in individual cases
 - e) conducting distance learning
 - f) diploma processing
 - g) implementation of the study program, including directing to clinical internships and exercises as well as training
 - h) awarding a rector's scholarship, a social scholarship, a social scholarship for the disabled, granting an allowance
 - i) providing job offers, internships, internships
 - j) necessary to fulfill legitimate interests (legitimate purposes), and the processing does not violate the rights and freedoms of the data subject.

VIII. HOW WE DISCLOSE PERSONAL INFORMATION

- 1. We disclose Personal Data:
 - a) external service providers of the University, so that they can provide data analysis services, provide information technology and related infrastructure, customer service, audit and others.
 - b) in order to fulfill legal obligations, in connection with court proceedings and inquiries of state authorities and institutions
 - c) as part of the implementation of the study program and legal obligations of the University

IX. RIGHTS OF NATURAL PERSONS

- 1. You have the right to:
 - a) access to the content of your own Personal Data
 - b) rectify or correct them
 - c) remove or limit processing;
 - d) request the data to be transferred
 - e) declare objection, including objecting to automated processing of personal data
 - f) lodge a complaint with the regulatory authority

2. If you would like to review, correct, update, restrict processing, delete Personal Data that you have previously provided to us, or if you would like to receive a copy of such Personal Data for transfer to another entity, you can contact us.
3. We will respond to your request in accordance with applicable law.
4. Please note that we may retain certain Personal Data for record-keeping purposes or to perform services that you started prior to requesting the change or deletion of your data.
5. If personal data has been provided with your consent, you have the right to withdraw your consent at any time, without affecting the compliance of their processing, which was made on the basis of consent before its withdrawal.

X. DATA SECURITY

We use reasonable organisational, technical and administrative measures to protect your Personal Data. Your Personal Data is secure.

XI. PERSONAL DATA RETENTION PERIOD

1. We retain Personal Data for as long as necessary or permitted for the purposes for which it was obtained as described in this Notice. When determining the duration of the storage period, we take into account the following criteria:
 - the duration of the relationship with you and providing you with access to the Site;
 - requirements of applicable law; or
 - whether the storage of information is recommended for our legal interest (e.g. in connection with the enforcement of the Terms and Conditions of the Party, applicable limitation periods, litigation or investigative activities of regulatory authorities).

XII. TRANSFER OF DATA ABROAD

1. The data we collect through the Website is not transferred outside the European Union.

XIII. PLIKI COOKIES

1. Cookies are a standard feature of websites. They allow us to store small amounts of data on your computer with information about your visit to our Website. Cookies help us find out which areas of the Site are useful and which areas need improvement.
2. Information about the cookies we use and the settings for cookies and similar technologies are available in the Cookie Consent Tool in the bottom right corner of the website
3. You may refuse to accept or accept cookies from the Website at any time by toggling the relevant settings on your browser. Information on the procedure to be followed to enable or disable cookies can be found on the website of the web browser manufacturer accessible through the help screen.
4. Please note that if cookies are disabled, your use of the Site may be restricted and some features of the Site may not work as intended. We may also use technologies similar to cookies, such as:
 - a) Pixel tags. Pixel tags (also known as web beacons and clear GIFs) are used, among other things, to track the activities of website users, measure the effectiveness of our marketing campaigns, and create statistics about the use of the Website and response rates.

- b) Adobe Flash. Local shared Flash objects (also known as Flash cookies or “Flash LSOs”) and other technologies are used, among other things, to collect and store information about how you use the Site. For Flash LSOs options, please visit this page. Please note that setting the Flash player to restrict the acceptance of Flash LSOs may reduce or hinder the functionality of some Flash applications.
 - c) Google Analytics. Google Analytics is a service provided by Google, Inc. ("Google"). Google Analytics to collect anonymous statistics to improve our Website. Learn more about Google Analytics and its privacy policy. You can selectively disable Google Analytics by installing Google's opt-out component in your browser.
5. Certain information is collected by most browsers or automatically through your device. These include, but are not limited to, Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, web browser type and version, and the name and version of the Site you are using. We use this information to ensure that the Website functions properly. Other sections of this Privacy Notice apply to the collection of personal data using cookies or similar technologies.

XIV. SUBMITTING A COMPLAINT TO THE REGULATORY AUTHORITY

1. The Controller has appointed a Data Protection Officer, who can be contacted at the e-mail address – iod@amh.edu.pl

XV. SUBMITTING A COMPLAINT TO THE REGULATORY AUTHORITY

- 1. You can lodge a complaint with the competent data protection authority in your country or place of infringement.
- 2. To obtain contact details for data protection authorities. In the case of Poland, the competent authority is the President of the Office for Personal Data Protection.