

PROCEDURES FOR PROCESSING PERSONAL DATA AT THE ESTONIAN ACADEMY OF MUSIC AND THEATRE

1. GENERAL PRINCIPLES

1.1. These procedures for the processing of personal data follows the General Data Protection Regulation (GDPR) and the Personal Data Protection Act and sets out the principles relating to personal data processing at the Estonian Academy of Music and Theatre ('the Academy'), the Academy's obligations when processing personal data, including security measures for the protection of personal data, and the rights of data subjects.

1.2. The Academy proceeds from the following principles when processing personal data:

- 1.2.1. lawfulness – personal data are collected only in a fair and lawful manner;
- 1.2.2. purposefulness – personal data are collected only for specified and legitimate purposes and they shall not be processed in any manner that is not compatible with the purposes of data processing;
- 1.2.3. minimality – personal data are collected only to the extent necessary to achieve the specified purposes;
- 1.2.4. limitation of use – personal data are used for other purposes only with the consent of the data subject or with the authorisation of the competent authority;
- 1.2.5. quality of data – personal data are up-to-date, complete and necessary to achieve the specified purpose of data processing;
- 1.2.6. security – security measures are taken to protect personal data against unintentional or unauthorised processing, disclosure or destruction;
- 1.2.7. individual participation – data subjects are informed of the data collected about them, they are given access to the data concerning them and they have the right to request the rectification of inaccurate or misleading data.

2. PURPOSES OF DATA PROCESSING

2.1. The Academy processes personal data only for the achievement of its legitimate statutory objectives and only to the extent necessary to achieve these purposes.

The activities through which the Academy pursues its statutory objectives are:

- 2.1.1. conducting studies at the three levels of higher education in accordance with the Standard of Higher Education, including issuing the corresponding graduation documents;
- 2.1.2. developing creative activities and research work and publishing, distributing and popularising results;
- 2.1.3. organising continuing education and issuing relevant certificates;
- 2.1.4. organising concerts, performances, conferences, master classes and other events;
- 2.1.5. providing support services relating to its principal activity, such as: payment of allowances and scholarships, academic and career counselling, library services, use of rehearsal classrooms, instrument and room rental, car park services.

3. DATA SUBJECTS AND DATA PROCESSING

3.1. The data subjects are primarily the Academy's employees, students, participants in continuing education, cooperation partners, and customers.

3.2. The Academy processes the following personal data:

- 3.2.1. the data of the Academy's students in accordance with the statutes of the Estonian Education Information System and to the extent that is required for conducting studies, paying scholarships and issuing graduation documents and their duplicates;

3.2.2. the data provided for in the agreements of the Academy's Continuing Education Centre, to the extent that is required for carrying out study work and issuing certificates;

3.2.3. the data provided for in employment contracts with the Academy's employees or other agreements regulating internal procedures, to the extent that is required for meeting the obligations arising from labour law;

3.2.4. data related to concerts, performances, conferences and other events organised by the Academy, as well as to clients and cooperation partners, which are required for the provision of services, advertising and/or cooperation.

3.3. From special categories of personal data, the Academy collects and processes data concerning the health of employees for meeting the obligations arising from labour law and laws relating to social security and social protection, as well as, on a voluntary basis, data concerning the health and families of students for the suspension (academic leave) or reorganisation of studies, the payment of study allowances, and the provision of support services for students with special needs.

4. SOURCES AND GROUNDS FOR THE PROCESSING OF PERSONAL DATA

4.1. The source of personal data is the information provided by the data subject.

4.2. Personal data are kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, including for archiving and use in statistics.

4.3. An initiative (incl. an application, petition, letter, request for information) or other appeal to the Academy on the part of the data subject may also be used as grounds for the processing of personal data.

5. THIRD PARTIES AUTHORISED TO RECEIVE AND PROCESS PERSONAL DATA

5.1. The Academy may transfer personal data to the following third parties without the consent of the data subject if there is a corresponding legal basis:

5.1.1. national databases: the Estonian Education Information System, the Employment Register, the Population Register, the Health Insurance Fund, the Defence Resources Agency;

5.1.2. persons involved in the performance of contracts concluded with the Academy (incl. providers of payment, communication, legal and/or IT services).

5.2. The processing and transmission of personal data may only take place in a manner approved by the Academy and through official channels; these are the electronic information systems of the Academy, the library database, the data exchanged with the data subject on paper, the official email addresses of the Academy or email addresses provided by the data subject, the Academy's official and public social media accounts.

6. RIGHTS OF THE DATA SUBJECT AND ACCESS TO DATA

6.1. The data subject has the right to receive information on the collection of personal data, access to his or her personal data, including the right to rectify personal data concerning him or her.

At the request of the data subject, the Academy shall inform the data subject of:

6.1.1. the purpose of processing the personal data;

6.1.2. the composition and sources of the personal data;

6.1.3. the third parties or categories of third parties to whom the transfer of personal data is authorised;

6.1.4. the third parties to whom his or her personal data have been transferred;

6.1.5. the name of the processor of personal data or their representative and the address and other contact details of the processor of personal data.

6.2. If possible, the Academy shall release the data and/or information in the manner and form requested by the data subject.

6.3. The Academy shall notify the data subject of a refusal to provide the data or information within five working days following the day of receipt of a petition, detailing the grounds for the refusal.

7. THE PROCESSOR AND THEIR OBLIGATIONS

7.1. The persons processing personal data on behalf of the Academy must:

7.1.1. process personal data in accordance with these procedures and/or the purposes and conditions set out in other internal regulations of the employer governing the processing of personal data, and in accordance with the employer's instructions;

7.1.2. be acquainted with the laws and legislation regulating the processing of personal data and, if necessary, participate in a training course on personal data protection offered by the employer;

7.1.3. maintain the confidentiality of personal data which have become known to him or her in the performance of his or her duties even after the completion of the duties related to processing or the termination of employment.

7.2. The Academy undertakes:

7.2.1. to ensure that the organisation of the processing of personal data complies with the applicable legislation and that the Academy's employees participating in data processing receive training and information related to data protection;

7.2.2. to implement adequate security measures to protect personal data in order to ensure data integrity, availability and confidentiality;

7.2.3. to block access to incomplete and/or incorrect personal data and take the necessary measures to improve and rectify them without delay;

7.2.4. to delete or close personal data which are not necessary for the specified purposes within a reasonable time.

8. PROTECTION OF RIGHTS AND CONTACT DETAILS

8.1. If the data subject finds that the Academy has violated his or her rights in the processing of personal data, he or she has the right to contact the Academy's data protection specialist with a request that the violation be brought to an end. The data subject also has the right to contact the Data Protection Inspectorate or a court at any time.