

THE ESTONIAN ACADEMY OF MUSIC AND THEATRE PRIVACY POLICY

1. GENERAL PRINCIPLES

1.1. This policy is guided by the EU General Data Protection Regulation (GDPR, 27 April 2016 (EU) 2016/679),¹ the Personal Data Protection Act,² the Republic of Estonia Education Act,³ the Estonian Academy of Music and Theatre Act,⁴ the Statutes of the Estonian Academy of Music and Theatre,⁵ the House Rules of the Estonian Academy of Music and Theatre⁶, the Regulations of Studies at the Estonian Academy of Music and Theatre⁷ and the recommended guidelines on the processing and protection of personal data issued by the Data Protection Inspectorate for the implementation of legislation. This Policy sets out the principles of data protection at the Estonian Academy of Music and Theatre (hereinafter the Academy), the Academy's obligations in the processing of personal data, including the security measures taken for the protection of personal data, and the rights of data subjects.

By law, the task assigned to the Academy is to promote research and culture and to provide education, research, and other services based on creative activities. As a legal person in public law, the university is the holder of public information throughout its activities.⁸

Personal data is understood as all identified or identifiable personal data concerning a natural person whose personal data is processed by the Academy, including the personal data of students in degree studies and continuing education, conference participants, employees, service providers, visitors, website visitors, and applicants.

The processing of personal data is an operation performed with personal data, including the collection, recording, systematisation, storage, modification, disclosure, accessing, querying, extraction, use, transmission, and deletion of such data.

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 achieving specified legitimate purposes and not processed in any manner incompatible with the purposes of data processing;
- 1.2.3. minimalism – 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 from unintentional or unauthorised processing, disclosure, or destruction;
- 1.2.7. individual participation – data subjects are informed of the data collected about them, given access to the data concerning them, and have the right to request the rectification of inaccurate or misleading data.

1.3 The Academy processes personal data in several information systems: the study information system ÕIS, the document management system, the room program, the repository, the sise.eamt.ee information system (e.g. assets, finances, human resources, contracts, workloads, CV register, instrument library), Persona, e-learning environments (e.g. Moodle, Zoom, LoLa) and via other IT

¹ <https://eur-lex.europa.eu/homepage.html?locale=en>

² <https://www.riigiteataja.ee/en/eli/523012019001/consolide>

³ <https://www.riigiteataja.ee/en/eli/505092022001/consolide>

⁴ <https://www.riigiteataja.ee/en/eli/529082019023/consolide>

⁵ <https://eamt.ee/en/about/statutes-and-regulations/>

⁶ <https://eamt.ee/en/about/statutes-and-regulations/>

⁷ <https://eamt.ee/en/about/statutes-and-regulations/>

⁸ <https://www.riigiteataja.ee/en/eli/529082019023/consolide>

systems supporting core activities (e.g. the EMTAVIDEO YouTube channel), as well as the video surveillance systems at the Tatari 13 and Toom-Kooli 4 Academy buildings.⁹

2. PURPOSES OF DATA PROCESSING

2.1. As a controller, 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 admissions to bachelor's, master's, and doctoral studies;
- 2.1.2. conducting studies at the three levels of higher education in accordance with the Standard of Higher Education, including issuing the relevant graduation documents;
- 2.1.3. developing creative activities, research and publishing, and distributing and popularising results;
- 2.1.4. organising continuing education and issuing relevant certificates;
- 2.1.5. organising concerts, performances, conferences, masterclasses, and other events related to its core activities;
- 2.1.6. providing support services related to core activities, including the payment of grants and scholarships, academic, psychological and career counselling, library services, practice classes, instrument and room rental, parking.

3. DATA SUBJECTS AND DATA PROCESSING

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

3.2. The Academy processes the following personal data:

3.2.1. The Academy processes the personal data of student candidates in its admission information system (SAIS) or based on consent submitted through the DreamApply international application system. The scope and principles of processing personal data provided through SAIS can be found [here](#). The same principles concerning DreamApply can be found [here](#).

3.2.2. The data of Academy students are processed to the extent necessary for conducting studies and creative work, organising performances and concerts, advertising, and marketing activities related to the promotion of professions, the payment of scholarships, and the issuance of graduation documents and duplicates. The legal basis for processing is the Academy's legal obligation that derives from the Academy's internal and national legislation.

3.2.2.1. The Academy processes the following personal data of students of degree studies according to the purpose of processing: first name and surname, photograph, personal identification number, date of birth, country of residence, citizenship, and contacts details; data on previous education, higher education to be acquired, and work experience, financial data, bank account number, data on family members and military service attendance, personal data generated upon video and image recording.

3.2.2.2 The Academy uses contact details to send notices about studies, but also notices about the Academy, invitations to participate in research, and important information about the Academy's organisations and news (e.g. events, alumni activities);

3.2.3. The Academy processes the data contained in continuing education contracts to the extent necessary for conducting studies and issuing certificates. The legal basis for data processing is: the [Adult Education Act](#) and the [EAMT internal regulations](#)

3.2.3.1. The Academy processes the following data of persons studying in continuing education courses: first name and surname, personal identification number, contact details, workplace, education and work experience details, payee details, personal data generated upon video and image recording.

⁹ See the Academy's video surveillance policy (available at: <https://eamt.ee/en/about/statutes-and-regulations/>).

3.2.4. The Academy processes employee data contained in employment contracts or other agreements regulating internal procedures to the extent necessary for performing the Academy's obligations under labour law;

3.2.4.1 The Academy processes the following employee data: first name and surname, personal identification code, contact details, employment data, education and work experience data, bank data, and personal data generated upon video and image recording.

3.2.5. The Academy processes data related to the Academy's concerts, performances, conferences, and other events organised by the Academy, and customer and cooperation partner data necessary for the provision of services, advertising and/or conducting cooperation activities.

3.3. Of special categories of personal data, the Academy collects and processes employee health data to meet its obligations under labour law and laws relating to social security and social protection, as well as data concerning the health and families of students for the voluntary suspension of studies (academic leave) or the reorganisation of studies, the payment of special allowances, and the provision of support services for students with special needs. Special categories of personal data are stored as long as necessary to fulfil the purpose of processing.

3.4 The Academy records its most important events and allows third parties to view the videos and images via the EMTAVIDEO YouTube channel, social media, and/or the Academy's website. At the request of its members, the Academy also records educational and research activities.

3.4.1 The Academy stores images and videos indefinitely for the purpose of archiving. The Academy may use the photos taken at public events in social media and advertising campaigns without asking the person's consent.

3.5 The Academy has a legitimate interest in using a video surveillance system for the purpose of guarding the buildings and premises owned and used by the Academy, as well as for the protection of the people and property in them. When installing video surveillance equipment, the Academy intends their range to cover the building's territory and indoor premises. Signs in the building inform about the use of the video surveillance system.

3.5.1. Access to video footage and real-time video image is granted only to employees who have received the appropriate training, and they have the right to process personal data only to the extent necessary to achieve the purposes of personal data processing. To ensure the security of the personal data processed by the Academy, unauthorised persons, including Academy staff, are prevented from accessing the surveillance devices and the video surveillance system to prevent unauthorised monitoring, copying, modification, transfer, and deletion of footage. The Academy transmits video footage to third parties only based on an official written request and only in the event of an obligation arising from the law.

3.5.2. The video surveillance system stores the video footage in the Academy's central servers for 2.5 months.

4. SOURCES AND BASIS FOR THE PROCESSING OF PERSONAL DATA

4.1. The source of personal data is the information provided by the data subject and the official e-mail addresses set up by the Academy for students and staff..

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

4.3. An initiative (including an application, petition, request for information) or other appeal to the Academy by the data subject may also serve as the basis 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 relevant legal basis:

5.1.1. national databases;

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

5.2 Personal data may be processed and transferred only in a manner approved by the Academy and through official channels: 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 and the EMTAVIDEO YouTube channel.

6. RIGHTS OF DATA SUBJECTS AND ACCESS TO DATA

6.1. The data subject has the right to receive information on the collection of personal data and to access their personal data, including the right to rectify their personal data.

At the request of the data subject, the Academy will 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 their personal data have been transferred;
- 6.1.5. the name of the entity processing the personal data or their representative, and the address and other contact details of such an entity.

6.2. If possible, the Academy delivers the data and/or information in the manner and format requested by the data subject.

6.3. The Academy will notify the data subject of its refusal to provide the data or information within a reasonable time, detailing the grounds for the refusal.

6.4 The Academy may refuse to satisfy a data subject's request to limit the processing of or delete personal data if the obligation to process personal data arises from the organisation of the Academy's core activities, a valid contract or the law, or is necessary for the preparation, submission or defence of legal claims in connection with the protection of persons and property.

7. PERSONS PROCESSING PERSONAL DATA 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 the purposes and conditions set out in this Policy and/or 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. keep secret the personal data that became known to them during the performance of their duties, including after completing their duties related to processing and after the termination of employment.

7.2. The Academy undertakes:

- 7.2.1. to ensure that the organisation of the processing of personal data and the data processing comply with the applicable law, and that the Academy's employees participating in data processing receive training and information related to data protection;
- 7.2.2. to take adequate security measures to protect personal data to ensure the integrity, availability, and confidentiality of the data;
- 7.2.3. block access to incomplete and/or incorrect personal data and take the necessary measures for the completion and correction of such data without delay;
- 7.2.4. to delete or close the personal data that are not necessary for the specified purposes within a reasonable time.

8. THE USE OF COOKIES

8.1 The Academy uses cookies on its websites to ensure the proper functioning and convenient use of the website. Cookies do not endanger the devices of the website visitor.

The Academy uses cookies to

- collect and analyse statistical data on website visits;

- enable web browser recognition and remember preferences;
- improve service quality.

8.2 Our data analysis and advertising partners (such as Google Analytics) can store cookies on the user's device when visiting the Academy's website.

8.3 The cookies used by the Academy do not contain the personal data of the website visitor and cannot be used to identify the website visitor. If the website visitor wants to limit the storage of cookies on the end device or delete saved cookies, this can be done from the web browser settings. More information about managing and disabling cookies can be found at <http://www.allaboutcookies.org/>

9. SECURITY, PROTECTION OF RIGHTS, AND CONTACT DETAILS

9.1. The Academy confirms that it complies with EU requirements regarding the protection of personal data and does everything in its power to protect personal data. We process personal data only for specific legitimate purposes and only to the extent necessary to meet these purposes. We require the same values from our cooperation partners when adhering to our personal data processing rules.

9.2. In the event of any incidents related to personal data, the Academy will take all necessary measures to alleviate the consequences and mitigate similar risks in the future.

9.3. If the data subject has any questions regarding their rights associated with the processing of their personal data or questions about how the Academy collects and uses personal data, or if you are not satisfied with the way the Academy processes your personal data, please contact:

the Estonian Academy of Music and Theatre
Tatari 13, 10116 Tallinn
+372 667 5700
info@eamt.ee

If the data subject finds that their request to the Estonian Academy of Music and Theatre has not yielded a satisfactory result, then the data subject has the right to submit a relevant appeal to the Estonian Academy of Music and Theatre or file a complaint with the supervisory authority:

The Estonian Data Protection Inspectorate
Tatari 39, 10134 Tallinn
Tel. +372 5620 2341
Email: info@aki.ee
Website: www.aki.ee

9.4 This Privacy Policy will be periodically reviewed and updated as necessary.