

Privacy and Cookies Policy

Taking into account security and confidentiality of your personal data, we hereby provide you with information about the purposes, scope and categories of data processed as well as your rights in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, in force since May 25, 2018 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 (hereinafter GDPR).

This Policy applies to webservices managed by Vistula University and the Vistula School of Hospitality.

I. INFORMATION ON THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH THE USE OF THE UNIVERSITY WEBSERVICES

Information on the Data Controller

The Controller of the data processed in connection with the use of the Vistula Group of Universities' webservices is one of the following universities, depending on the website visited and the activity performed by the user, as well as the selected field of study:

- **Vistula University**, Stokłosy 3, 02-787 Warsaw, e-mail address: info@vistula.edu.pl,
- **Vistula School of Hospitality**, Stokłosy 3, 02-787 Warsaw, e-mail address: info@vistula.edu.pl,

The Controllers have appointed a **Data Protection Officer** who can be contacted at the following e-mail address: iod@vistula.edu.pl.

Purpose, legal basis and the period of personal data processing

- Implementation of goals as described on individual webpages of the website or separate websites related to various university activities. If a given webpage contains a data collection form, additional information on data processing will be provided.
- **In the case of a webservice related to recruitment for studies –**
 - administering the user/candidate account in the recruitment webservice. The legal basis for data processing is the person's voluntary consent expressed by creating an account on the webservice. Data processing will be conducted until the consent is withdrawn, e.g. by deleting the account or submitting an application to close the account,
 - recruitment for a selected field of study. The legal basis for data processing is the necessity of data processing in connection with the legal obligation of the Data Controller, which is the Act of July 20, 2018 - Law on Higher Education and Science. In the case of voluntarily provided data regarding disability, data processing is based on the provisions of Art. 9 section 2 letter g, related to the implementation of an important public interest, which is the implementation of tasks related to ensuring conditions for people with disabilities to fully participate in the process of admission to studies, doctoral schools, education at studies and doctoral schools or conducting scientific activities, to which we are obliged in accordance with the regulations the Law on Higher Education and Science. The data will be processed until the completion of the recruitment process.
 - conclusion and performance of the study contract. The legal basis for data processing is the necessity of processing data necessary to conclude and perform the contract and the fulfilment of the controller's obligations in connection with the Act on Higher Education and Science. Data will be processed until the expiration of the limitation period for claims under the contract or until the expiration of the obligation to store accounting documents in connection with accounting regulations and the storage of documents related to the learning process, in line with the Law on Higher Education and Science.
- **Marketing purposes**
 - providing information about the Vistula Group universities offer. For the purposes of sending commercial information, voluntary consents are obtained for the purposes of sending

commercial information transmitted via telecommunications terminal devices and automatic calling systems, via e-mail, text messages and telephone contact. The legal basis for data processing is the person's voluntary consent, expressed by checking the appropriate checkbox or by providing contact details for this purpose. Data processing will continue until the person withdraws his/her consent. The consent can be withdrawn at any time by changing the consent status in the account or sending a request to the controller to withdraw the said consent.

- profiling related to selecting the offer. The legal basis for data processing is the legitimate interest of the controller. The legitimate interest of the controller consists in profiling as part of marketing activities aimed at tailoring the offer and the sent information. Data processing will continue until the person objects to profiling.
- **Contacting the University,**
 - response to a question sent in the contact form, via e-mail or in connection with telephone conversation. In this case, data will not be processed for marketing purposes. The legal basis for data processing is the necessity to process data in order to implement the legitimate interest of the Data Controller, which is to provide reliable information to persons contacting us and to redirect the matter to the appropriate department in our universities. The correspondence will be stored for the period of 1 year, unless the case concerns issues requiring a longer storage period, e.g. until the limitation period for claims expires or in connection with ongoing court/debt collection cases.
- **Providing data in connection with job advertisements or a CV submission,**
 - recruitment for the position, as advertised. The legal basis for data processing, in the scope of data required from the candidate and necessary for employment, are the legal provisions of the Labour Code. As regards additional data provided in the application form, the legal basis for data processing is the person's voluntary consent expressed by submitting the application. Data will be processed until the completion of the recruitment process.
 - future recruitment processes conducted by the universities of the Vistula Group of Universities. The legal basis for data processing is the voluntary consent of the person provided in the CV. Data processing will continue until the consent is withdrawn, which will be tantamount to the deletion of the data. Regardless of the withdrawal of consent, the data will not be processed for the period longer than 1 year.
- **In the scope of personal data processed in connection with the use of cookies, the data is processed for the purposes of:**
 - proper operation and security of the website, as well as to record the consents granted by users. The legal basis for the processing of data collected in connection with the use of this type of cookies is our legitimate interest related to the necessity to process data for the provision of services and the provision of appropriate functionalities of the website (Article 6(1)(f) of the GDPR) as well as the need to process data in connection with the provision of a service delivered electronically via the website (Article 6(1)(b) of the GDPR).
 - recording the user preferences (e.g. language selection, automatic data filling, logging in to the website). In the case of session cookies, the legal basis for data processing is our legitimate interest related to the provision of the service and the implementation of functionalities selected by the user (Article 6(1)(f) of the GDPR). If these cookies are used for a period of time longer than the session time, the legal basis for data processing is the user's consent (Article 6(1)(a) of the GDPR).
 - analytical and performance purposes, i.e. collecting data and information on how the webservice is used. Such cookies help to improve the functionality of the webservice, however due to the collection of information on how the webservice is used, the legal basis for processing this information is the user's consent (Article 6(1)(a) of the GDPR).
 - marketing purposes by tracking users' activity on the Internet in order to provide data to advertisers or other organizations for the purpose of displaying specific advertisements to users. The legal basis for data processing in connection with the use of such cookies is the user's consent (Article 6(1)(a) of the GDPR).
- handling complaints or defence against claims, which is the legitimate interest of the Data Controller. The data will be processed until expiration of claims.

Data recipients

- authorized employees and contractors of the Data Controller, including lecturers (in the case of starting studies),

- service providers contractually entrusted with the processing of personal data for the purposes of providing services to the Data Controller, in particular entities such as call centres, student recruitment agencies, IT service providers, accounting companies, debt collection companies, advertising agencies, entities supporting the recruitment process, companies providing mailing services - to the extent required for the proper performance of the ordered services,
- entities that are independent data controllers to whom data will be made available in connection with the contract being performed for the data subject, in particular entities providing services: electronic payments, banking, courier, postal and legal services.
- Personal data is also entered into the POLON system, an integrated information system on science and higher education, which supports the work of the Ministry of Science and Higher Education, as well as the Central Statistical Office and the Central Commission for Degrees and Titles.

Voluntary data provision

Providing data for the performance of the contract is voluntary, but necessary for its performance. The scope of data necessary for the recruitment process for studies and in connection with studying also results from the provisions of the Law on Higher Education and Science. Providing data for marketing purposes is voluntary. In other cases, data will be processed on the basis of consent expressed by checking the appropriate checkbox, setting cookies in the panel or by providing data for this purpose in the form.

Transfer of data to third countries

Due to the use of IT solutions from external suppliers, e.g. Microsoft, it may be necessary to transfer personal data to recipients in third countries. In order to ensure the security of personal data, we cooperate only with entities based on Standard Contractual Clauses approved by the European Commission, while maintaining appropriate measures to guarantee the security of processed data at least at the level applicable in the European Union.

There may also be situations when we will be obliged by law to transfer data to a third country, or such a transfer will be necessary to perform the contract with the student.

Rights related to the processing of Personal Data

Any person whose personal data are subject to processing may at any time exercise the following rights:

- the right to demand access to personal data and obtain information on its processing (in accordance with Article 15 of the GDPR),
- the right to demand correction of personal data if it is incorrect (in accordance with Article 16 of the GDPR),
- the right to demand restricting the processing of personal data in cases and according to the terms specified in Art. 18 of the GDPR,
- the right to withdraw consent to the processing of personal data or a form of marketing communication, which, however, will not affect the lawfulness of data processing that was carried out before the withdrawal of consent,
- the right to demand deletion of data in accordance with Art. 17 of the GDPR (“the right to be forgotten”),
- the right to transfer personal data in accordance with Art. 20 of the GDPR, i.e. to receive personal data in a structured, commonly used, machine-readable format (by computer), as well as to request its transfer to another data controller; This right only applies to data that the person has provided to us, processed on the basis of that person’s consent or contract and applies only to data provided in an electronic form,
- the right to object at any time to the processing of personal data for reasons related to the person’s specific situation, if the data is processed by us as part of the implementation of our legitimate interests (in accordance with Article 21(1) of the GDPR),
- the right to object at any time to the processing of personal data for direct marketing purposes, including profiling, to the extent in which the processing of this person’s data is related to such direct marketing (in accordance with Article 21(2) of the GDPR).

The request to exercise the above rights may be submitted by post to the address of the Data Controller's registered office or to the e-mail address of the Data Protection Officer: iod@vistula.edu.pl

In order to efficiently exercise the above rights, please include in your application the following categories of information:

- data identifying the applicant (name and surname and e-mail address or telephone number),
- other additional information that would enable identification of the person in our data resources.

The data provided in the application will not be processed for any purposes other than handling the request.

Notwithstanding the above rights, the data subject has the right to lodge a complaint against the processing of his/her Personal Data by the Data Controller to the President of the Personal Data Protection Office (address: Stawki 2, 00-193 Warsaw).

II. Links to other websites

Our webservices may contain links or references to other websites that are not covered by the provisions of this Privacy Policy. We encourage users to read the privacy policies of each website they visit. We do not hold any responsibility for the information or services provided by other entities whose websites can be accessed via links and connections available at our webservices.

III. Advertising banners

The website may also display marketing information about products or services based on the legitimate interest of the Data Controller, which is conducting direct marketing. Banner advertisements are not targeted at any specific user unless the user expresses his/her consents to appropriate marketing cookies.

Cookies policy

Cookies are text files sent by a webservice and saved on the hard drive of a computer, smartphone or other end device through which the user connects to the Internet. Cookies do not cause any damage to computers, devices or files stored on them. Cookies are useful as they allow webpages to recognize your device and appropriately display their content.

Do we use cookies and how?

Our webservices use cookies. It allows us to recognize the user's device during a subsequent visit. Cookies are used, among others, to save preferences set by the user. With the user's consent, our webservices and cooperating entities place cookies on computers visiting our webservices. They allow us to learn about users' preferences and ratings, at the same time helping us to constantly improve our services. However, cookies do not recognize the user (e.g. by name and surname). They only recognize the settings and behaviour of an anonymous user who used a given webservice on a specific device.

What types of cookies do we use?

We may use the following types of cookies on our webservices:

- cookies that are strictly necessary for the operation of our webservice – which enable correct functionality of the available services, e.g. authentication cookies used for services requiring authentication, to record consents granted to us. These cookies cannot be disabled and will always be marked as working in the cookie settings panel.
- preferential/functional cookies – which enable collecting information on how the webpages are used, recording the settings selected by the user. In the case of session cookies, they will function similarly to the strictly necessary cookies without the user's consent. However, if their lifetime is longer than the session time, the user will be able to voluntarily consent to them.
- performance/analytical cookies – used to calculate website statistics and conduct various analyses, allowing for a better understanding of user behaviour. These cookies will only be saved upon the provision of voluntary consent.

- marketing cookies – which allow providing users with advertising content tailored to their interests and limiting the number of views of a given advertisement. Marketing cookies may also include cookies from our partners, such as Google, Facebook. These cookies will only be saved upon the provision of a voluntary consent.

How long is data stored in cookies?

Our webservices may use two types of cookies - session cookies and cookies with a lifetime longer than the session time. The former are temporary files stored on the user's end device until logging out, leaving the website or turning off the software (web browser) (session cookies). Persistent cookies are stored on the user's end device for the time specified in the cookie parameters or until they are deleted by the user. The lifespan of cookies is usually indicated in the cookie settings panel on a given website. Additionally, it can be also checked using the functionality of a web browser.

Do we use third party cookies?

The user visiting our websites may receive cookies from third parties, such as Facebook, Google cooperating with us. More information about these cookies can be found on the websites of individual third parties.

Google Analytics

Our webservices use the Google Analytics service provided by Google Ireland Ltd. (Gordon House, Barrow Street, Dublin 4, Ireland) and Google LLC (1600 Amphitheater Parkway Mountain View CA 94040 USA) for the purpose of analysing website traffic. For this purpose, cookies are installed on the user's device to collect information about the user's browser and device, IP address, visited websites and date and time, in order to analyse the user's activity on the website and provide other services related to this activity. The website operates based on the anonymization of IP addresses originating from countries belonging to the European Economic Area. Only in exceptional cases is the full IP address transmitted, which is anonymized on Google servers in the USA.

Meta marketing pixel

When you visit our website we will activate, upon your consent, the Meta Platforms Ireland pixel (Meta Platforms Ltd., 4 Grand Canal Square, Dublin 2, Ireland).

The pixel informs Meta Platforms Ireland what actions you take on our website, as well as what data can be used to identify you by Meta Platforms Ireland (including application/browser information, language settings, time, IP address, advertising identifier).

This data allows Meta Platforms Ireland to see that you have visited our website, that you have clicked on our website or that you have clicked on a link on Facebook or Instagram that connected you to our website. This allows Meta to show you ads based on your interests on Facebook, Instagram or other websites. Meta may associate this data with your user account and use it for its own purposes. Information on data processing by Meta Platforms Ireland can be found at <https://www.facebook.com/about/privacy>.

We do not receive any data about you or any other users of Meta Platforms Ireland, only statistics that show us (in an aggregated manner across all users and only over a specified period of time) how users have interacted with our offers and advertisements on other Meta Platforms Ireland platforms (Facebook, Instagram). This helps us determine which of our ads are successful and which are not.

In order to transfer the data collected via the pixel, we and Meta act as so-called "**Joint controllers**" in accordance with Art. 26 of the GDPR. Therefore, we have concluded a separate agreement, which you can find by following the link: https://www.facebook.com/legal/controller_addendum. In the case of further processing of your data, the sole controller is Meta. If you want to exercise your rights to obtain information, delete it, etc. (see the "Rights related to the processing of Personal Data" section), Meta Platforms Ireland is responsible for their implementation as part of our activities as Joint Controller.

Twitter (conversion tag)

When you visit our website we will activate, upon your consent, the Twitter tag (Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland).

The tag informs Twitter what actions you take on our website, as well as what data can be identified.

This data allows Twitter to see that you have visited our website, your clicks and whether you reached our website by clicking on a link on the Twitter platform. This allows Twitter to show you content based on your interests. Twitter may associate this data with your user account and use it for its own purposes. You can find information about the processing of your data by Twitter by following the link: <https://twitter.com/de/privacy>.

We do not receive any data about you or any other Twitter users, only statistics that show us (in an aggregated manner across all users over time) how users have interacted with our offers and ads on other Twitter platforms. This helps us determine which of our ads are successful and which are not.

Detailed list of cookies.

The current list of cookies used on a given website can be found in the cookie settings panel via the link provided at the bottom left of the page (Cookie icon), in the Show details/Cookie statement tab.

Managing cookies

Cookies help in particular to increase the user's convenience when visiting our Webservice. Restricting the use of cookies may affect the functionalities available on the Webpages of the Webservice. Disabling the use of necessary cookies, among others, for authentication processes, security, and maintaining user preferences may hinder and, in some cases, prevent the use of the webservice.

Each visitor to the webpages can adjust cookie settings using the cookie settings panel, which appears on the first visit to the website and is available by clicking the link at the bottom left. (**Cookie icon**). Voluntary consents can be changed at any time by restarting the cookie settings panel.

How to delete cookies saved on your device.

Browsing software (web browsers) usually allow storing cookies on the user's end device by default. Webservice users can change these settings. The web browser allows, among others to manage cookies for a specific website, delete all or individual cookies, and automatically block cookies by increasing the level of privacy. However, please remember that blocking all cookies in your browser will hinder or prevent proper functioning of the website due to the inability to operate essential cookies.

Detailed information on handling cookies by a given web browser is available in the settings of the used browser or in the descriptions on the browser manufacturer's website.

[Chrome](#)

[Firefox](#)

[Safari](#)

[Microsoft Edge](#)

[Internet Explorer](#)

[Opera.](#)

Persons using our webservices agree to the terms and conditions set out in this Privacy and Cookies Policy.

In case of any changes to the Privacy Policy, the amended version will be posted on this website.
Date of the last update of the Privacy Policy: April 2023.