

SEERC Students – GDPR Policy Guide

JANUARY 2022

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Introduction

GDPR is Europe's new framework for data protection laws. It replaces the previous 1995 data protection directive. The new regulation started on 25 May 2018.

The **General Data Protection Regulation (EU) 2016/679 (GDPR)** is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas. The GDPR's primary aim is to enhance individuals' control and rights over their personal data and to simplify the regulatory environment for international business. You can find here the official [PDF](#) document of the Regulation (EU) 2016/679 (General Data Protection Regulation) in the current version.

The South East European Research Centre (SEERC), the research centre of CITY College, which facilitates the collaborative PhD programme between the University of York and CITY College, University of York Europe Campus needs to hold and process personal data relating to its cooperating and affiliated legal entities, staff, students, and projects to (a) keep proper records, provide support and guidance to students and staff (b) to run the business and activities of the South East European Research Centre, and (c) to fulfil its legal obligations.

The actions taken so far, for the Research Centre to comply with the Personal Data Protection Regulation, as well as the procedures, which have been foreseen and which must be observed by the students are the following:

Students – Data Protection and GDPR

Student Privacy notice: prospective, current, and former student data

The South East European Research Centre needs to hold and process personal data relating to its PhD students: (a) to keep proper records, provide support and guidance to students and monitor academic progress; (b) to run the business and activities of the South East European Research Centre, and (c) to fulfil our legal obligations. The PhD students are registered at York University and are hosted by South East European Research Centre.

We hold financial, sponsorship, and fees data and record payments; information on health and disability so that we can properly support students; academic information so we can track progress and provide appropriate learning and teaching support and opportunities; information related to employability and career opportunities.

Provision of Personal Data

In addition, the South East European Research Centre needs to hold and process personal data relating to those seeking to become students (prospective students and applicants), in order to

support and guide prospective students, assess academic suitability for admission, and facilitate the admission process, including assessing their academic records and achievements from previous and other studies, keep track of their visa and residence permit applications and relevant procedures and documentation (for International students).

A student registration form (**APPENDIX A**) is provided to all students at the beginning of the registration process with all needed data. The data is being processed by the South East European Research Centre in accordance with the EU General Data Protection Regulation and Data Protection Act 2018 and with all legislation enacted in Greece in respect of the protection of personal data ("**Data Protection Legislation**") and by the University of York in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

Information storage

The information provided for PhD students is kept on a physically safe local computer. The only persons that have access are the SEERC Director, the Director of the PhD Programme, and the PhD Programme Administrator.

Security of Data

The South East European Research Centre takes the security and integrity of all the personal data it holds very seriously. We believe our systems are secure. We do not release information about students to any third parties outside the South East European Research Centre unless we have a legal obligation to do so. We do not release information about students to others except this derives from the contractual agreement (**Terms and Conditions upon acceptance of an Offer**) which in this case might be fee payers and financial sponsors, and additionally in very serious emergency situations.

The handling of personal data is controlled by the General Data Protection Regulation (GDPR) and associated legislation. The South East European Research Centre is obliged to provide all registered students with the following information which explains in detail how and why we are processing their personal data and explains their legal rights. As a student, you can find here the official [PDF](#) document of the Regulation (EU) 2016/679 (General Data Protection Regulation) in the current version.

Data Controller: The South East European Research Centre

Supervisory Authority: Hellenic Data Protection Authority

How and why we are processing your personal data and your legal rights

Categories of information

Personal information, contact details, residency, nationality, educational history & background, employment history, reference letters, supporting statements, disabilities, corresponding address,

parents/sponsors contact information, immigration data and documents for visa and residence permit, student's progress, and attendance data, academic information during the studies, financial data.

Sources of information

- Provided by students
- Agents and recruitment consultants
- Partner institutions
- Financial Sponsors
- Research Councils

Purposes of processing

Information provision according to the contractual agreement and legitimate purposes. Applicants/Students assessment, academic management/progression, document administration, academic performance review, equal opportunities monitoring, payment processing, legal and statutory compliance, student records management, academic support, careers service activities, students' service activities.

Legal basis for processing

The processing is necessary for the performance of a contractual relationship between SEERC and data subject and on the grounds of public task.

Transfers outside the EU

The South East European Research Centre does not transfer student data outside the European Union.

Retention periods

The South East European Research Centre needs to be able to confirm who has been a student; whether they have successfully completed their studies or not and needs to be able to do this for all previous years. Therefore, certain information about former students will be retained permanently.

Access rights

As a student, you are entitled to a copy of all the information that the South East European Research Centre holds about you, although you may not be able to receive information that identifies or relates to anybody else. If you would like a copy of your records, please contact the PhD Programme Administrator at phd_admin@seerc.org. To help us provide you with the information as quickly as possible, it would be very helpful if you could provide us with as much information as possible, particularly if you can specify which sort of information you are interested in. You will be required to provide proof of identity, such as an official public document (state ID or passport), photograph, and a signature.

Portability

You have the right to move your personal data to another data controller. However, this right is limited to the following circumstance:

- data which you have provided directly to the South East European Research Centre yourself
- data which is used to fulfil a contract or is in preparation for a contract
- the data is automated (i.e., this right does not apply to paper records).

To exercise this right, please contact the PhD Programme Administrator at phd_admin@seerc.org.

Erasure (Right to be forgotten)

Without prejudice to the data held by the South East European Research Centre of students enrolled on the PhD programme, data present on SEERC's website and any personal data held solely for the purpose of marketing and promotion can be erased by registering such a request with the PhD Programme Administrator at phd_admin@seerc.org.

Restriction/Objection

The law gives you the right to object to the processing of your personal data carried out by the South East European Research Centre and/or to ask the South East European Research Centre to restrict the processing of your personal data. These are not absolute rights (except for the right to prevent the use of your personal data for marketing and fundraising purposes) and apply only in limited circumstances. You can object to your data being used for research or statistical purposes, but not where the research is being carried out in the public interest. You can also ask the South East European Research Centre to restrict any processing of your data if you think the data we hold about you is inaccurate. The rights of objection and restriction are complicated, and each instance will be assessed individually. If you wish to exercise either of these rights, please contact the PhD Programme Administrator at phd_admin@seerc.org.

Withdrawal of consent

You have the right to stop any processing which is based solely on your consent:

- advertising and promotion of the South East European Research Centre, its goods, and services
- fundraising (this does not include information relating to applications which will include information about your prospective department, opportunities to visit, and scholarships).

Please contact the PhD Programme Administrator at phd_admin@seerc.org.

Complaints to Hellenic Data Protection Authority

After raising any potential issue with the South East European Research Centre, if you feel that the South East European Research Centre has not dealt correctly with your personal data, you can complain to the [Hellenic Data Protection Authority](#).

Consequences of not providing data

The South East European Research Centre relies on having up-to-date and correct information about its students. Students have a responsibility to inform the South East European Research Center if we are holding incorrect information and giving us a chance to put things right. The South East European Research Centre will only ask you to provide information for which it has a genuine need. If you fail to provide any requested information, there is a chance that your records could be incorrect or incomplete and this could lead to problems that take time and trouble to sort out.

Policy for use of Personal computer systems

It is suggested for the PhD students at SEERC to make use of the provided computer facilities responsibly. PhDs are entitled to facility usage guidance by the Computing Support Services staff (i.e., technical support on the basic environment and facilities that are initially provided). It is highly suggested not to use any part of the infrastructure for personal matters.

Security of Personal Computers where personal data is stored

The computers provided to PhD students by SEERC are treated as publicly accessible and are not dedicated to each one individually. The computers are publicly accessible from SEERCs staff but they are set up in a way that any individual users' personal data is neither accessible nor modifiable for external parties.

Policy for use of antivirus programs and security settings

All systems in SEERC's infrastructure are updated, in terms of security patches, or, if that is not the case, antivirus software is recommended (installed by default on older in-premises systems). Modern operating systems handle security adequately by default.

Policy for use of Cloud Storage Services

The usage of such services (i.e., Dropbox, Google Drive, etc.) is unrestricted once granted. Confidentiality is a policy though, which is handled by each individual.

Appendices

A. STUDENT REGISTRATION TEMPLATE

Full name	
Registration number	
Department	
Mode of studies (FT/PT)	
Start date	

Declaration: I hereby accept and agree to observe the University of York's Ordinances, Regulations, Policies, and Procedures. I have checked all of the information provided when applying and have made any changes required.

Data Protection: Your personal data will be processed by the University of York and the South East European Research Centre, in accordance with the EU and the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018, and with all legislation enacted in Greece in respect of the protection of personal data ("**Data Protection Legislation**").

I confirm that the personal data I have provided is accurate and complete.

I understand that my personal data may be shared with the UK Government and its agencies.

I understand that the University of York, and the UK Government and its respective agencies, may seek to verify the accuracy of this information, and may do this by reference to personal data held by other institutions and agencies.

I understand that, if I am required to attend a part of my programme in York, information about my enrolment, attendance, and progress at the University of York may be passed to UK Visa & Immigration (UKVI) for purposes connected with immigration, if applicable.

I understand that my personal data will be processed by the University of York and/or SEERC where this is necessary for the performance of SEERC's contract with me and/or for the purposes of the legitimate interests of the University of York and/or SEERC and/or tasks carried out by the University of York and/or SEERC in the public interest and may also be shared with third parties that process data on the University of York and/or SEERC's behalf to support SEERC in fulfilling its obligations and responsibilities to and relationship with me.

I understand that additional information about the legal bases on which my personal data is processed and the third parties with whom it may be shared, (and further details in relation to those third parties) is available in the Student Privacy Notice at:

<https://www.york.ac.uk/records-management/dp/your-info/students>

I confirm that I have read and understood the Regulations and Policies information provided to me as part of my admission's procedure

(<https://www.york.ac.uk/about/organisation/governance/governance-documents/ordinances-and-regulations/regulation-2/>).

SIGNATURE: _____

DATE: _____