Privacy Policy

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 (hereafter GDPR) entered into force on 25 May 2018, emphasizing the protection of individuals regarding the processing of personal data as a fundamental right.

The Regulation is intended to contribute to the accomplishment of an area of freedom, security and justice and union, in order to guarantee economic and social progress, taking into account the well-being of individuals. ((2) GDPR).

Everyone has the right to the protection of personal data concerning him or her.

Universitas – Cooperative for Higher Education and Scientific Research, CRL, founding body of ISEC Lisboa, is committed to ensure the confidentiality of all personal data received and stored in its database.

Thus, personal information is carefully processed and protected with all due diligence that data processing requires, according to Regulation (EU) 2016/679, General Data Protection Regulation (GDPR).

The Privacy Policy is a public statement, shared through available media, so as to ensure its informed knowledge regarding the purposes of data processing, internal management and compliance with legal obligations.

Universitas, C.R.L. is the organism responsible for processing personal information.

APPLICANTS TO COURSES OFFERED BY ISEC LISBOA

Applications:

Application is a preliminary stage, often referred to as pre-contractual, that currently has a substantial practice relevance, comprising a constellation of preparatory acts both material and legal.

Collected data is processed as part of the application process and its storing time is valid during the analysis, decision and enrolment period, not exceeding 40 days after the conclusion of the enrollment phase, exempting the following situations:

A) If applications are validated and accepted, the information collected and stored in the student’s individual file shall not be deleted; taking into account the requirements of Protection, clarity and assurance that there is a formal proof that the person has applied for a certain course.
B) If applicants are admitted, their information is stored and shall not be deleted; taking into account the requirements of Protection, clarity and assurance that there is a formal proof that the person has applied for a certain course.

ISEC LISBOA’S STUDENTS AND ALUMNI:

ISEC Lisboa students are required to provide personal data to attend the courses for which they have signed a contract of provision of higher education services. Without these data, admission and remaining in higher education are not feasible. The data for the contract of provision of higher education services is personal data that shall not require consent, since they are essential and mandatory for the contract signature, and Article 6, point 1(b) of GDPR shall apply accordingly.

The processing of ISEC Lisboa’s alumni and former students’ personal data (the ones that finished their degrees and the ones that left the course without finishing it, respectively) does not cease with this fact, given that for storing and public interest purposes, the information provided by the holder must remain preserved, in compliance with the Principles of Transparency, Publicity and Legal Certainty, namely for Public Entities, Organs of Power or law enforcement agencies obtain information, as well as the holder himself/herself, in case they need a documentary proof that they have attended a certain course in a given period.

In order to comply with the General Data Protection Regulation (GDPR), institutional operations, which are usually undertaken by the several ISEC Lisboa Services and Bodies, may be divided according to their relevance, especially in necessary operations and optional operations.

Necessary operations are essential for contract performance, the fulfilment of legal obligations, the performance of tasks carried out in the public interest and pursuit of the controller’s legitimate interests. Optional operations are all those which, although relevant, are not essential to the pursuit of interests and obligations (legal and/or contractual).

NECESSARY OPERATIONS:

*Operations required for students’ academic, pecuniary and curricular management* – the processing of personal data is carried out by the Registry Office, the Treasury, the Student Ombudsman, the Legal Office, and the Supervisory Entities;

*Operations required for curricular, educational (including workshops, conferences, training enrichment actions organised by ISEC Lisboa in the students’ areas of interest and also welcome activities*
in students’ application and/or enrollment processes), regulatory, internal notes, changes to faculty, collegial and directing boards, administrative and organisational communications, accounting, bibliographic material and academic research – the processing of personal data is carried out by the Information Technology Services, Communication Office, and Library, which grant access to digital facilities (moodle, Wi-Fi network, website);

**Operations required for students’ academic file management in its different stages, according to curricular, legal and contractual requirements, in compliance with procedures determined by national regulations for higher education** - the processing of personal data is carried out by management organisms, such as the Pedagogical and Scientific Boards, the General Management Board, the Head of School and Course Coordinators;

**Operations required for certification, issuing of declarations, archive, national statistics, inspections and other legal and contractual obligations, depending on the feasibility of the contract and the current national legislation for higher education** – the processing of personal data is carried out by public entities and supervisory entities;

**Operations required for archive and future retrieval of academic data, namely related to individual files of alumni registering their academic progress, as well as registers of students’ grades, and all documents kept by ISEC Lisboa** – the processing of personal data is carried out by the Registry Office, ISEC Lisboa’s Secretary-General and Board of Directors;

**Operations required for academic and document management related to all academic procedures, as well as financial management, enable through digital platforms** – the processing of personal data is carried out by DIGITALIS - software and service company whose mission is to aid Higher Education Institutions (also ensuring encryption);

**Operations required to place students in internship programmes at companies with which a protocol of collaboration has been established, when this internship is mandatory for the conclusion of certain study cycles or courses, and the respective archive for future retrieval** – the processing of personal data is carried out by the Professors, the Coordinators, the Board of Directors, the Registry Office and the Secretary-General;

**Operations required to management of courses taught in association or partnership** – the processing of personal data is carried out by the Registry Office, ISEC Lisboa’s Secretary-General, the Professors and Higher Education Institutions or Educational Institutions;

**Operations required for statistical purposes** (student performance, satisfaction questionnaires, pedagogical assessment, employability) – the processing of personal data is carried out by the Office for Quality Assessment and Assurance.
OPTIONAL OPERATIONS:

Advertise and publicize courses and events, newsletters, promotions, invitations, jobs, internships – the processing of personal data is carried out by the Communication Office;

Processing of personal data by the Office for Employment to inform about job offers, professional training opportunities, internships, selection and recruiting processes;

Processing of personal data by the Office for International Relations to manage mobility programmes, partnerships, international collaboration protocols;

Processing personal data by the Students' Union, in order to accomplish its mission;

Processing personal information by the Registry Office, Reception Service and Campus Entrance in order to grant parking permission and to perform their ordinary duties.

Universitas, C.R.L. does not supply, by any means, the collected and stored information to third parties, and merely uses the data for the purposes that justify its processing, and which have been duly authorized. However, and due to public interest, official supervisory or regulatory entities may, within their jurisdiction, require access to personal information, in which case this information might be disclosed, this act being registered, as well as in situations that, due to contractual demands or specific determinations, personal information has to be shared with certain institutions, such as A3ES, the Directorate-General of Higher Education (DGES), Digitalis, the Ministry of Science, Technology and Higher Education and all its decentralised agencies, and others.

The information compliance policy of this institution ensures that each user only accesses information which is strictly necessary for the performance of his/her tasks, keeping a record of access authorizations and resorting, whenever possible, to pseudonymisation, through the use of a candidate or student code, thus minimising the risk of privacy violations, and limiting processing of information to the procedures which are strictly necessary to perform contract duties.

Using personal information

Legitimate use of personal information

Your personal information will only be used if one of these situations occurs:
a) You gave your consent by signing a printed document or by clicking on an acceptance option on an online form.

b) Your personal information is necessary for compliance with legal and contractual obligations (this includes formal requests of different kinds, requests for diploma or curricular unit equivalences, complaints, among others, presented to the Registry Office and which may be analysed by the Pedagogical Board, by the Scientific Board, by the Course Coordinator, or by the Student Ombudsman, so as to ensure the contract fulfilment);

c) Your personal information is necessary for the fulfilment of ISEC LISBOA’s legitimate interests, as long as these do not come before your own interests, rights, freedom and safeguards;

d) Your personal information is necessary for compliance with contractual duties, and without processing them the feasibility of the contract would not be guaranteed;

e) Debt assumption, in accordance with and for the purposes of Article 595 of the Civil Code.

The fulfilment of contracts always implies processing information by services, organisms, and people (professors and administrative staff). Without this processing, it would not be possible for the agreement which the student voluntarily entered into with ISEC Lisboa to be executed.

The situations described above in a non-exclusive way allow for the fulfilment of the contract and the contractual duties of both parties, which implies that the processing of personal information is legal, according to Article 6 of the GDPR.

Your personal information shall not be used for any purposes other than those described in this policy without your prior information and consent, unless in situations which do not require this consent.

Your personal information shall be processed by ISEC LISBOA according to technical and organisational measures that ensure a high level of security, within the framework of the GDPR, whereby confidentiality and privacy with regards to the information provided are guaranteed.

**Retention Periods:**

Your personal information shall not be retained longer than is justifiably necessary and it shall be processed proportionately to the purposes described above, with the exception of academic data which cannot be deleted, as well as information associated with it, due to academic requirements.

With regards to staff and service providers, their personal information shall be retained for the purpose of honouring legal obligations and protecting the legitimate interests of ISEC LISBOA, throughout the term of the contract and up to one year after its termination.
Sharing of personal data

According to the purposes defined in the Privacy Policy, your personal data may be shared with the following entities:

a) With your consent, your personal information may be shared with companies where you might be placed during internship programmes, according to your own interest and will;
b) Public Authorities, within their jurisdiction;
c) Courts of Justice, within their jurisdiction;
d) Processing and storing at the Registry Office;
e) Processing and storing after course completion;
f) Retrieval by teachers – via Higher Education Integrated Management System;
g) Communication Office (promotion, communications, etc.);
h) Head of School and Course Coordination;
i) Technical and Scientific Board – for credit transfer, admission and other academic procedures;
j) Members of the Board of Directors;
k) Treasury and Financial Management of tuition fees;
l) Computing and IT support to enable access to digital platforms;
m) Library;

n) Office for International Relations;
o) Judicial Office for debt collection;
p) Regulatory Bodies;
q) Public Entities for document certification (Endorsement by The Hague Convention);
r) Bank responsible for emission of student cards;
s) Students' Union;
t) Organisms collaborating with ISEC LISBOA for student internship programmes;
u) Higher education institutions collaborating with ISEC LISBOA in courses taught in association or partnership;
v) DIGITALIS - software and service company whose mission is to aid Higher Education Institutions (also ensuring encryption);
w) Portuguese Immigration and Borders Service (SEF);
x) Others legally foreseen.

The sharing of records is essential to ensure the feasibility of contracts regarding the rendering of higher education services, given that this is based on synergy between institutions and services that, together, allow these contracts to be fulfilled in the terms of their particularities.

The Privacy Policy is grounded on goodwill, which is the framework for the juridical relations involved. Thus, all procedures by both parties should also be based on that principle.
According to this Privacy Policy, using your personal information might involve transferring records to other countries, namely countries of origin, always in compliance with the GDPR.

**YOUR RIGHTS:**

Data subjects may, at any time:

a) Access their personal information;
b) Rectify their personal data;
c) Object to the processing of their personal information;
d) Restrict processing or ask for the erasure of their records (Right to be Forgotten);
e) Portability of their data, in a structured, compatible way and legible format.

Exception: With regards to lines c) and d), these actions do not apply to persons who have enrolled (students, alumni) in a course, a curricular unit, or any other context involving admission, which implied entering into a contract with ISEC LISBOA in order to receive a service related to education, or during the term of a contract between a worker or service provider and ISEC LISBOA, considering the contractual obligations of both parties.

Exception: Lines c) and d) shall not be applied, as their fulfilment is revoked, whenever there are legal obligations issued by the Public Authority and the Sovereignty bodies (namely Courts of Justice).

Contracts for rendering educational services, contracts for rendering teaching services, employment contracts for teachers all have particularities which must always be observed, with regards to keeping personal records in time, so that any person might obtain proof of admission, enrolment, and approval, so that academic information can be verified and obtained for professional purposes and tender procedures, among others.

The processing of personal data according to the particularities of contracts is contemplated in the lawfulness of processing personal data (see paragraphs (40), (43), (44), (50), (68), (111), (153), (155) of the Regulations, and Article 6, point 1, par. (b); Article 7, point 4; Article 22, point 1; Article 49, point 1, par. (b); Article 85, all of which are from the GDPR).

This privacy policy applies to all ISEC Lisboa courses and educational offers, although it might be needed to make appropriate adjustments in accordance with the specificities of each course type.
Withdrawal of consent

Whenever consent is legally required for processing personal information, data subjects have the right to withdraw their consent at any time. However, that right does not compromise the legitimacy of processing data according to prior consent, neither does it compromise the later processing of the data, with other legitimate reasons, such as the fulfilment of the or the legal obligations that ISEC LISBOA might be subject to.

To withdraw your consent, you should contact our Head of Data Protection through the following e-mail address: epd@iseclisboa.pt.

The Head of Data Protection will answer any queries related to our privacy policy or any questions related to the application of the National and European Regulations about Data Protection.

Head of Data Protection:

Name: Romana Madeira.
E-mail address: epd@iseclisboa.pt
Institutional address: Alameda das Linhas de Torres, no. 179, 1750-142 – Lisbon, Portugal.

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To exercise your rights, please contact our Head of Data Protection through the following e-mail address: .epd@iseclisboa.pt

Your requests shall be handled with special care, to guarantee that your rights are ensured.

You may be asked to prove your identity so as to ensure that the disclosure of personal information is made to the actual data subject.

Please bear in mind that, in certain cases, within the terms of the law, your request may not be immediately or totally met, although this will always be justified and dealt with within reasonable time.

You are also entitled to make a formal complaint to the national control authority: www.cnpd.pt