

Internal Regulation No. 6/2024

Directive of the Rector of the Bratislava International School of Liberal Arts On Personal Data Protection



The Rector of the Bratislava International School of Liberal Arts (hereinafter “BISLA”) issues this directive on personal data protection at BISLA in accordance with the BISLA Organizational Regulations as amended.

Part One

Introductory Provisions

Article I Definition of the Directive's Context and Purpose

1. In conducting its activities as a higher education institution defined in its statutes and internal documents, the Bratislava International School of Liberal Arts, n.o. (hereinafter "BISLA") processes personal data.
2. BISLA respects the right to personal data protection and complies with the obligations set by relevant legislation in processing personal data.¹
3. Personal data protection is part of BISLA's information security policy, acknowledging the unique nature of personal data and the need for its special and heightened protection.
4. This directive defines:
 - (a) the principles that guide BISLA in processing personal data;
 - (b) the primary responsibilities for personal data protection at BISLA;
 - (c) the basic organization of personal data protection at BISLA;
 - (d) areas to be further regulated by BISLA's internal policies that implement personal data protection measures.²

Article II: Principles of Personal Data Processing at BISLA

1. In processing personal data, BISLA adheres to the following principles:
 - a) **Lawfulness, Fairness, and Transparency:** Personal data are processed in a lawful, fair, and transparent manner with respect to the individuals concerned.
 - b) **Purpose Limitation:** Personal data are collected for specific, explicit, and legitimate purposes and are not further processed in ways incompatible with those purposes. This is in line with Article 8(1) of the Charter of Fundamental Rights of the European Union and Article 16(1) of the Treaty on the Functioning of the European Union. Compliance is also maintained with the EU's General Data Protection Regulation (GDPR) and relevant national law (Act No. 18/2018 on data protection).
 - c) **Data Minimization:** BISLA limits personal data collection to what is adequate, relevant, and necessary for the purposes for which it is processed.
 - d) **Accuracy:** BISLA ensures that personal data are accurate and updated as necessary. Outdated or incorrect data are corrected or deleted to ensure they remain accurate for the intended purposes.
 - e) **Storage Limitation:** Personal data are kept in a form that permits the identification of

¹ Article 5 of the GDPR

² E.g., Internal Data Protection Policy

individuals only for as long as necessary for the processing purposes.

f) **Appropriate Security:** Personal data are processed in a manner that guarantees adequate security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical and organizational measures. Data are never shared with third parties beyond the individual concerned or for purposes other than those intended.

Article III: Definition of Key Terms

1. In this directive, the following terms are used as defined in Article 4 of the GDPR or in the following manner:
 - a) **Designated Vice-Rector:** This refers to the Vice-Rector to whom the BISLA Rector assigns full responsibility for personal data protection matters. Typically, this role is assigned to the Vice-Rector for Library and Information Services unless the Rector decides otherwise. (referred to as the "designated Vice-Rector").
 - b) **Responsible Person:** This is an employee of BISLA who has been appointed by the Rector to the position of Data Protection Officer (DPO), which includes notifying the Slovak Data Protection Office (referred to as "the Office") of their contact details, ensuring a conflict of interest does not arise, and confirming the DPO's qualifications. The responsible person is also obligated to properly perform their duties according to Articles 38 and 39 of the GDPR (referred to as the "BISLA responsible person").
 - c) **Adopted Measures:** These represent the internal data protection system at BISLA, which consists of relevant internal regulations, adopted technical and organizational measures, BISLA instructions, and actions performed by the BISLA responsible person (referred to as "adopted measures").

Article IV: Responsibility for Personal Data Protection

1. The Director of BISLA, as the statutory body, is responsible for the level of personal data protection at BISLA. The **designated Vice-Rector** is responsible for the creation, review, and updating of the adopted measures.
2. Details regarding responsibilities and tasks for ensuring personal data protection at BISLA will be outlined in a methodological guide.
3. The duty to comply with the adopted measures extends to BISLA's employees, students, external collaborators, the academic self-government, the Board of Directors, BISLA's contractual partners, and third-party employees who have access to personal data processed at BISLA. The **BISLA responsible person** is tasked with informing the relevant groups about their duties under these measures and ensuring compliance.

4. **BISLA Employees:**

- a) May process only the personal data necessary for performing their work duties and in a manner consistent with the purposes of data processing.
- b) Are required to protect personal data within their scope of responsibility and collaborate in the protection of personal data at BISLA.
- c) Must notify BISLA of any incorrect or outdated information in their personal data processed by BISLA and provide necessary information for corrections or updates.

5. **BISLA Students:**

- a) Must protect personal data within their scope of responsibility and cooperate with the BISLA responsible person in data protection efforts.
- b) Must inform BISLA of any errors or outdated personal information and provide necessary details for correction or updates.
- c) Must comply with the adopted measures as they apply to them.

6. **Other Individuals with Access to BISLA's Personal Data:**

- a) Must familiarize themselves with the data processing conditions at BISLA to the extent needed to perform their duties related to BISLA (e.g., attending required training programs, reviewing relevant internal regulations, or following issued instructions).
- b) Must comply with the adopted measures for data processing at BISLA that they have been informed about.
- c) Must adhere to any specific contractual obligations and measures related to data processing, particularly those outlined in data processing agreements under Article 28(3) of the GDPR.

Part Two

Organization of Personal Data Protection

Article V: Personnel Security and Competencies

1. **Designated Vice-Rector**

- a) Is responsible for the overall concept of personal data protection at BISLA. This includes tasks such as the creation, review, monitoring, reassessment, modification, and updating of the adopted measures.
- b) Submits an **annual report** on the state of personal data protection at BISLA to the members of the BISLA management. This report is incorporated into the **Internal Quality System Evaluation report**.

- c) Coordinates the resolution of issues, including serious personal data breaches³, and informs the BISLA management accordingly.
- d) Issues **methodological guidelines** with internal legal binding that further define and explain the adopted measures based on this directive.
- e) Issues **binding instructions** for the recipients of personal data or data processors acting on behalf of BISLA. The designated Vice-Rector is also authorized to delegate this power to other persons within BISLA.

Article VI BISLA Data Protection Officer

1. BISLA will always designate at least one BISLA Data Protection Officer⁴ and establish conditions for their work⁵. If the scope of personal data protection tasks at BISLA requires, additional persons may be appointed, managed by the BISLA Data Protection Officer.
2. The BISLA Data Protection Officer is the top expert authority in personal data protection at BISLA in line with Article 38 of the GDPR.
3. The BISLA Data Protection Officer performs tasks under Article 39 of the GDPR, specifically:
 - (a) prepares conceptual, operational, and methodological materials on data processing at BISLA;
 - (b) analyzes and proposes changes to BISLA's policies related to data protection;
 - (c) consults on data protection conditions in contracts concluded by BISLA;
 - (d) analyzes data processing procedures related to changes in information systems at BISLA or overall conditions of data processing;
 - (e) resolves issues related to data processing at BISLA, including analyses, incident resolution, and complaints;
 - (f) prepares materials for the Vice-Rector and BISLA Management;
 - (g) organizes and conducts data protection training for employees and students;
 - (h) monitors compliance with legal requirements and internal regulations when processing personal data at BISLA;
 - (i) approves changes to methodological guideline attachments without needing the Vice-Rector's specific approval;
 - (j) cooperates with the Slovak Data Protection Office.

³ According to Article 4(12) of the GDPR, a "personal data breach" is a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data that is transmitted, stored, or otherwise processed.

⁴ Article 37 of the GDPR

⁵ Article 38 of the GDPR

4. The Data Protection Officer reports directly to the designated Vice-Rector but may also discuss serious matters related to data protection and GDPR compliance directly with the Rector of BISLA at any time.
5. Each organizational unit at BISLA, as well as any recipient processing personal data at BISLA or on its behalf, is required to provide the BISLA Data Protection Officer with the necessary cooperation to fulfill the duties outlined in paragraph 3.

Part Three

Common and Final Provisions

Article VII Common Provisions

1. The Rector authorizes the Appointed Vice-Rector to develop and issue, in the form of methodological guidelines:
 - (a) implementing regulations for this directive;
 - (b) standards of knowledge on data protection for internal data recipients at BISLA;
 - (c) a unified approach to internal training on data protection;
 - (d) a unified approach for conducting data protection impact assessments according to Article 35 of the GDPR and its approval mechanism.
2. Upon request from staff, the BISLA Data Protection Officer, in cooperation with the IT Center and the Teaching and Learning Center, will arrange training for selected employees. This training will aim to explain GDPR requirements and the practical implications of the methodological guidelines issued under this directive.

Article VIII Final Provisions

1. This directive enters into force on the date of signing.

In Bratislava, October 16, 2024

Doc. Samuel Abrahám, PhD.