



# ISTEC Lisbon Privacy Policy



SGQ-REG-39 R0 - 05/23



## **ISTEC Lisbon Privacy Policy**

### **Preamble**

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as the GDPR), entered into force on 25 May 2018, emphasizing the protection of individuals concerning the processing of personal data as a fundamental right.

The RGPD, in Art. 1 (object and objectives), point 1, "... lays down the rules relating to the protection of individuals concerning the processing of personal data and the free movement of such data.", as well as in point 2, "this Regulation upholds the fundamental rights and freedoms of individuals, and in particular their right to the protection of personal data."

ITA - Instituto de Tecnologias Avançadas para a Formação, Lda, as the instituting body of ISTECLisbon - Instituto Superior de Tecnologias Avançadas de Lisboa, is committed to ensuring the privacy of personal data received and stored in its databases.

Accordingly, this ISTECLisbon Privacy Policy establishes that information of a personal nature is treated and protected with all the diligence and care that data treatment requires, following Regulation (EU) 2016/679, RGPD.

### **Article 1**

#### **Objectives**

The Instituto Superior de Tecnologias Avançadas de Lisboa, hereinafter referred to as ISTECLisboa, as a private higher education institution, needs to collect personal data in the scope of its mission, and the ITA - Instituto de Tecnologias Avançadas para a Formação, its instituting entity, is responsible for the processing of such data under the current legislation.

ISTECLisbon is strongly committed to the protection of personal data and the respect for the exercise of the right to privacy of its users. This policy helps the academic community and its stakeholders to understand how ISTECLisbon collects, uses, handles, and protects the personal data of its users, being aligned with the General Data Protection Regulation (2016/679 of 27 April 2016) and other applicable legislation.

### **Article 2**

#### **Personal Data**

Personal data is information relating to an identified or identifiable natural person, directly or indirectly, such as through name, photograph, identification number, or any other specific element of identity provided for by the legislation in force.

### **Article 3**

#### **Entity responsible for data processing**

The entity responsible for collecting and processing the data is the ITA - Institute of Advanced Technologies for Training, instituting ISTECLisbon, considering the nature, scope, context, and purposes of data processing, as well as the risks to the rights and freedoms of individuals, by the RGPD.

### **Article 4**

#### **Data Protection Officer (DPO)**

For questions concerning the processing of personal data and concerning the exercise of your rights under the GDPR, the Data Protection Officer may be contacted at the following address: [protecao.dados@istec.pt](mailto:protecao.dados@istec.pt). The ISTECLisbon Data Protection Officer has the following duties, among others:

- a. Informs and advises ISTECLisbon or the subcontractor, as well as the employees handling data, regarding their obligations under the GDPR or Union or national legislation-
- b. Monitors the compliance of the data processing with European Union or Member State data protection provisions and with the policies of the controller or processor about the protection of personal data.
- c. Provide advice, when requested, about the data protection impact assessment and monitor its performance, under Article 35 of the GDPR.

- d. Cooperates with the supervisory authority, which you may consult and is your point of contact in matters related to data processing.

## **Article 5**

### Collection of personal data

ISTEC Lisbon is committed to protecting the privacy of users of its services and to this end takes care to develop and/or use technology that offers the best guarantees of security and privacy.

Most of the time, users are given the possibility to browse ISTECS Lisbon's websites without having to provide personal data. Sometimes, however, some information essential for the provision and access to services is collected and stored.

The cookies used by ISTECS Lisbon respect anonymity and will not be used to collect any personal information. The ISTECS Lisbon websites use the Google Analytics service whose information stored in cookies is kept by Google for statistical purposes and analysis of searches.

Google's privacy policy can be consulted at: <https://policies.google.com/privacy/update>

Depending on the context of the interaction with ISTECS Lisbon, the data that is collected and/or processed may include, namely:

- a. Identification data: Examples - name, student number, photograph, filiation, nationality, place of birth, date of birth, gender, marital status, civil identification number, identification document number.
- b. Contact details: Examples - address, address (physical and or e-mail), telephone contacts.
- c. Academic data: Examples – the cycle of studies, course, year of enrolment, attendance regime, total number of ECTS registered/approved and respective grades, regime of entry into higher education, previous educational establishments, academic qualifications, number of retentions, professional situation.
- d. Payment data: Examples - settled and unsettled amounts, bank identification number, scholarship holder status, receipts for fees and other charges.
- e. Sound and image data: Examples - photographs and video.
- f. Health data: Examples - medical history, drug use, medical certificates, allergies and other intolerances.
- g. Biometric data: Examples - fingerprint matrix.

## **Article 6**

### Handling of personal data

ISTEC Lisbon respects the right to privacy of its users and does not collect personal information other than the personal data voluntarily provided by filling in a form or other legitimate means.

By making available personal data to ISTECS Lisbon, the user acknowledges and consents that such data will be processed following this privacy policy and treatment of personal data, with the guarantee that such data will only be used for the purposes described at the time of collection.

Whenever ISTECS Lisbon collects personal data, the transfer of which depends on the owner's consent, the user will be informed of the specific, determined, explicit and legitimate purposes of the collection.

Should the processing of personal data for a purpose other than that initially described be justified, the user will always be asked for his/her explicit consent for such processing, except for cases in which processing is lawful without consent, under the legislation in effect.

## **Article 7**

### Sharing personal data with third parties

ISTEC Lisbon will only share the personal data of the user with:

- a. Public Administration bodies (Ministry of Science, Technology and Higher Education, Directorate-General of Higher Education, Directorate-General of Education and Science Statistics, Tax Authority, among others).
- b. Institutions of the banking sector and insurance companies, for managing and processing payments and signing insurance contracts.

- c. Institutions with which ISTECS Lisboa has signed contracts or cooperation instruments (for example, Caixa Geral de Depósitos under the partnership for the issue of the student card, other higher education institutions under international mobility protocols, among others) under the terms strictly necessary for their execution.
- d. Other institutions or individuals in case of consent of the user.

Any other transfer of data will require the user's explicit consent to such processing.

### **Article 8**

#### **Lawfulness of personal data processing**

Under the current legislation on personal data protection (RGPD), ISTECS Lisbon may also lawfully process the user's data in specific situations, such as when:

- a. The processing is necessary for the performance of a contract, to which the data subject is a party, or to carry out pre-contractual diligence at the request of the data subject.
- b. The processing is necessary for compliance with ISTECS Lisbon's legal obligations.
- c. The processing is necessary to protect the vital interests of the data subject or other individuals.
- d. Processing is necessary for the legitimate interests pursued by ISTECS Lisboa or by third parties unless the interests or fundamental rights and freedoms of the data subject prevail and require the protection of personal data if the data subject is a minor.
- e. The processing is necessary for fulfilling the obligations and exercising the specific rights of ISTECS Lisboa or of the data subject in terms of labour legislation, social security and social protection, as provided for in the RGPD.
- f. The processing is necessary for archiving and public interest purposes, scientific or historical research, or for statistical purposes, under the terms of the RGPD.

### **Article 9**

#### **Confidentiality**

The information collected is for ISTECS Lisbon's use according to the purposes indicated at the time of collection or to comply with legal obligations. The information collected will be treated confidentially and may be accessed by a restricted set of ISTECS Lisboa employees, in compliance with their professional duties, within the precise limits and for the exercise of their functions.

### **Article 10**

#### **Protection of personal information**

ISTECS Lisbon will apply the appropriate and necessary technical and organizational measures to protect the information stored in the system against access, use, alteration, or destruction of personal information. Personal data will be kept for the minimum period necessary for the specific purposes of the processing which were the basis for their collection or further processing, in compliance with the legislation in force.

### **Article 11**

#### **Data Subject Rights**

At any time, the holder of personal data has the right to request access to their data, as well as to request rectification or erasure, to oppose its processing, to withdraw their consent and to exercise the other rights provided by law, within the limits of current legislation.

Should the holder of the personal data withdraw his/her consent, this shall not affect the lawfulness of the data processing carried out based on the prior consent given. The holder of personal data also has the right to be notified in the event of a personal data breach, under the GDPR.

### **Article 12**

#### **Applicability**

Generally, this privacy and personal data treatment policy applies to all services provided by ISTECS Lisbon, without prejudice to other policies, agreements, and legislation applicable in more specific contexts of collection and treatment of personal data.

**Article 13**  
Security Incident Management

ISTEC Lisbon has an incident management mechanism available for data protection, privacy and information security incidents, which is operated by the GIS - Information Technology and Systems Office. ISTEC Lisbon makes every effort to maintain and apply the most appropriate threat detection technologies to identify and respond to security or privacy incidents (and any personal data breaches under the RGPD) without undue delay.

**Article 14**  
Changes to ISTEC Lisbon's Privacy Policy

ISTEC Lisbon may change the privacy policy and treatment of personal data whenever technically or legally justifiable. The changes apply to the new processing of personal data and, if they have an impact on the processing of personal data already collected, ISTEC Lisboa will inform the data subject of these changes so that he/she may give his/her explicit consent or assert his/her right of opposition or deletion.

**Article 15**  
Effective Date

ISTEC Lisbon's Privacy Policy will come into effect the day after its publication on ISTEC Lisbon's website ([www.istec.pt](http://www.istec.pt)) and in other usual places.

Lisbon, May 8, 2023

Approved by:

The ITA Management – Instituto de Tecnologias Avançadas para a Formação

(Augusto Ferreira Guedes)

The Director of the Instituto Superior de Tecnologias Avançadas de Lisboa

(José António Carriço)