

Free Academy of Tbilisi



Personal Data Protection Policy



Article 1. General provisions

1.1. The purpose of the document is to protect basic rights and freedoms in the Tbilisi Free Academy (hereinafter "the Academy"), including ensuring the inviolability of personal information and personal life;

1.2. The Personal Data Protection Policy establishes the personal data protection strategy, mechanisms and tools in the academy;

1.3. The document applies to academic, administrative, invited and support staff employed by the Academy, students, graduates and/or any other person exercising their authority on behalf of the Academy.

1.4. The legal document of the Academy is in accordance with the Law of Georgia "On Personal Data Protection", the current legislation of Georgia and the recommendations of the State Inspectorate in this field.

Article 2. Goal of the document

2.1. To establish the rule and procedure for the protection and processing of personal data collected in the course of the Academy's activities;

2.2. To ensure that the processing process is carried out in accordance with the legislation, to protect the rights of the person and to ensure the transparency of the processing.

Article 3. Definition of terms

3.1. The terms used in the legal document are explained based on the work specifics of the Academy and are in compliance with the Law of Georgia "On Personal Data Protection";

3.2. **Personal data** - information related to an identified or identifiable person. A person is identifiable when he/she can be identified directly or indirectly, including by name, surname, identification number, geolocation data, identifiable electronic communication data, physical, physiological, mental, psychological, genetic, economic, cultural or social characteristics;

3.3. **Special category data** - data related to a person's racial or ethnic affiliation, political views, religious, philosophical or other beliefs, membership of a professional union, health, sex life, status of the accused, convicted, acquitted or victim in criminal proceedings, conviction, diversion, recognition as a victim of human trafficking (trafficking) or "On prevention of violence against women and/or domestic violence, protection and assistance to victims of violence" in accordance with the law of Georgia, imprisonment and execution of the sentence against him, as well as biometric and genetic data, which are unique to a natural person processed for identification purposes;

3.4. **Data person** - any person whose data is used by the Academy for university purposes;

3.5. **Data processor** - an academy that determines the purposes and mechanisms of data processing, methods, forms, data protection measures, as well as the ways of realizing the data person's rights and obligations;



3.6. Authorized person - A person designated by the Academy, on the basis of law, internal legal acts and/or contract, who processes data on behalf of the University and based on its purposes. The authorized person of the Academy for data processing on the basis of the contract is "Ini Group" LLC;

3.7. Data processing - any action performed on personal data, including their collection, retrieval, access to them, their photographing, video and/or audio monitoring, organizing, grouping, connecting, storing, changing, consolidating, etc. Processing can be carried out in a fully automatic, semi-automatic or fully manual manner;

3.8. Third party - a third party is any natural or legal person, public institution, except for the data subject, personal data protection service, university and authorized person;

3.9. Consent of the data subject - after receiving the relevant information by the data person, by active action, written (including electronically) or verbally, freely and clearly expressed will to process data about him for a specific purpose. Consent may be given orally and/or in writing, including by using an appropriate electronic means of communication.

Article 4. Personal data in the Academy

4.1. Personal data is processed:

by automatic means;

with semi-automatic means;

by non-automatic means.

4.2. The following data are processed in the academy:

a. **Administrative/support staff** - name, surname, personal number, photo, date of birth, age, gender, copy of identity document, series and number of said document, expiration date, copy of driver's license, biography, information on education, information on knowledge level of foreign languages, copy of diploma, copy of documents confirming education/qualification, information about knowledge of computer programs, information about work experience, information about reporting to work, telephone number, e-mail address, address of residence/registration, bank details, information about military obligation, precondemnation, information on compensation, conviction, information on conviction for committing crimes against sexual freedom and inviolability, information on health status (form 100);

b. **Academic and invited staff** - name, surname, photo, date of birth, age, citizenship, gender, registration/residential address, personal number, copy of identity document, series and number of identity document, date of issue of identity document, autobiography, resume (CV), information about education, information about knowledge of a foreign language, copy of diploma or certificate of education, information about knowledge of computer programs, information about work experience, hourly workload, information about reporting to work, phone number, e-mail address, bank account number, Position (position), salary information, profession and professional achievements, scientific publications, inventions, patents, workload of a person in other universities;

c. **Employment candidate** - name, surname, autobiography, resume (CV), copy of diploma or certificate of education, information on work experience, information on knowledge of foreign languages, information on

knowledge of computer programs, phone number, e-mail address, residence/registration address;

d. **Student** - name, surname, personal number, series and number of identity document, date of issue of identity document, photo, phone number, e-mail address, date of birth, knowledge of foreign languages, gender, information about education, citizenship, information about military obligation, a copy of the student's educational card or its extract, all legal acts determining the student's status (enrollment order, suspension of status, restoration), a copy of the order of the Ministry of Education, Science and Youth of Georgia on granting the right to teach in accordance with the law, information confirming general education (certificate), information about participation in the social program;

e. **University visitors** - first name, last name.

4.3. The terms of personal data storage are determined by the order of the Minister of Justice of Georgia dated March 31, 2010 N72 and according to the legal regulations in force at the Academy;

4.4. Personal data in the academy is processed in accordance with the law, recorded in the file system, where the purpose of processing, the basis and the data retention period are indicated;

4.5. Personal data, the grounds for processing of which are not prescribed by law, are processed only with the consent of the data subject;

4.6. The Academy processes and issues such personal data in the form of an order, which is related to the granting, termination, suspension, restoration of the student status, as well as the appointment of financial benefits and scholarships. The Academy is authorized to publish the order for public information if it is determined by law;

4.7. The Academy, based on the interests of students, processes special categories of data, such as data related to health status, only based on the request of the data subject and his consent;

4.8. The Academy has the right to process data for the purpose of plagiarism prevention and detection;

4.9. The Academy is authorized to process personal data during disciplinary measures;

4.10. The Academy is entitled to re-process personal data for the purposes of career promotion for graduates, to carry out research on the employment rates of graduates;

4.11. The Academy processes the data of juveniles based on the consent of the legal representative;

4.12. The Academy provides continuous monitoring of personal data protection;

4.13. The University informs the employee and student about the processing of personal data through the contract and the data protection policy document.

Article 5. Processed data and their use

5.1. Management of personal affairs of employed persons, creation and organization of reserve bases for in-demand positions, evaluation of personnel, implementation of offers for employed persons, signing of contracts, business trips, vacations and other documentation, survey of personnel, organization of competitions for vacant positions;

5.2. Organization and control of document circulation, legal provision of proceedings, development of regulatory acts, review of statements of individuals, provision of legal advice on issues related to the educational process, representation of the Academy in court and third party relations;



5.3. Conducting evaluations, educational, scientific, research work, as well as improving the professional development of staff, evaluating students' activities and quality control, planning and managing library activities;

5.4. Management of student bases, electronic case management, effective communication with employed persons, academic and invited personnel;

5.5. Ensuring and preventing security in the territory of the Academy - improving the quality of services provided;

Data and their processing in Online format

5.6. The Academy is authorized to use various electronic platforms (for example, Zoom, Teams, Moodle, Google Meet, etc.) to hold remote meetings, for which it provides access or other communication from a person's home computer to a work computer using modern electronic programs.

Article 6. Entities and person/persons responsible for personal data processing

6.1. Within the scope of its competence, the Academy has/can have access to personal data:

- Rector;
- Senate;
- School of Business Administration and Social Sciences;
- School of Law;
- Quality management service;
- Legal Support Service;
- Human resources management service;
- Public relations service;
- Financial and material resources service;
- Safety and Health Care Service;
- International Relations Service;
- Registry and information technology service;
- Student/alumni Assistance and career development center;
- Examination center;
- Scientific research center;
- Library.

6.2. In the academy, a person responsible for personal data processing is defined - hereinafter "officer", which ensures the effective fulfillment of the requirements of the personal data protection legislation;

6.3. The officer in his own right - is independent in the performance of his/her duties and is accountable for their performance directly to the Rector of the Academy. It is not allowed to create an obstacle or interfere with the work of the officer. The officer in the academy is appointed by the rector.

Article 7. Student base

7.1. In order to administer the student base, the Academy has signed an agreement with the relevant service provider (authorized person), through which the service provider provides the service of the relevant electronic database system for the Academy;

7.2. "Ini G" LLC is the service provider at the academy.

Article 8. Video surveillance

8.1. Video surveillance is carried out on the external perimeter of the Academy's administrative building, at the entrance and in the corridors of the building;

8.2. The purpose of video surveillance is to ensure the safety of students and other persons, to protect juveniles from harmful influences, to protect property and/or to protect confidential information;

8.3. In addition, video surveillance in the academy is allowed only in the space designated for examination process, which is a means of ensuring the control and transparency of the examination center;

8.4. Warning signs about the video surveillance produced in the academy are placed in appropriate visible places;

8.5. Records obtained as a result of video monitoring in the Academy are kept for 3 (three) working days;

8.6. Safety and Health Care Service and Registry and Information Technology Service have access to video monitoring at the Academy;

8.7. Audio monitoring is not performed in the academy;

8.9. For the purpose of operational - search measures and crime investigation, upon request, the Academy will hand over the video recording to the relevant agencies only in the case of a judge's ruling or on the basis of a motivated resolution of the prosecutor in case of urgent necessity;

Article 9. Authority of a person

9.1. A person is entitled to apply to the Academy and request information about data processing;

9.2. A person is entitled to receive information from the Academy about the processed information;

9.3. The requested information must be provided to the person immediately, except in exceptional cases, and in exceptional cases no later than 10 working days;

9.4. A person is entitled to request corrections to the data;

9.5. The data person has the right to request a temporary suspension (blocking) of data processing in case the purposes and/or grounds of data processing, their validity or accuracy are disputed. Data is blocked within 3 (three) calendar days from the request;

9.6. The data person has the right to request the termination of processing, deletion and/or destruction of existing data about him;

9.7. The data person is entitled to file a complaint with the Academy in case of violation of the rights and



defined rules provided by the legislation and this policy. A complaint can also be submitted to the Personal Data Protection Service and/or to the court;

9.8. A parent or other legal representative has the right to receive information about an under-age student, and in the case of adult students, information is provided to parents only with the consent of the student;

9.9. In order to exercise the rights stipulated by the policy, the data person applies to the Academy in a written statement or sends a message to the e-mail info@freeacademy.edu.ge, which the Academy considers in accordance with the law of Georgia - "Personal Data Protection";

9.10. The data person has the right to contact the Personal Data Protection Officer of the Academy by e-mail at info@dpo.ge or by phone at 555 50 51 58 regarding the provision of information about data processing processes and his rights.

Article 10. Responsibility

10.1. The university community is obliged to follow the personal data protection policy;

10.2. The Academy ensures the awareness of the university community regarding the personal data protection policy;

10.3. Violation of the personal data protection policy in the academy will lead to the initiation of disciplinary proceedings;

10.4. Violation of the personal data protection policy by a student in the academy will lead to the initiation of disciplinary proceedings;

10.5. Technical and organizational security of data processing is ensured in the academy;

Article 11. Final Provisions

11.1. The present document of the Academy shall come into effect upon signing;

11.2. Any type of change in the regulations must be in accordance with the current legislation of Georgia and must be approved by the Senate of the Academy in the form of an amendment or addition.

