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# STOCKHOLM SCHOOL OF ECONOMICS IN RIGA PRIVACY POLICY

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Date: \_\_\_\_\_

Approved: \_\_\_\_\_

**Anders Paalzow**  
Rector, SSE Riga

## OBJECTIVE OF THE PRIVACY POLICY

1. The SSE Riga Privacy Policy seeks to provide information to natural persons / data subjects about the objective and scope of processing of personal data as well as the protection of such data and the duration of their processing.
2. Personal data is any information about an identified or an identifiable natural person. Definitions, explanations and information about types of data are included in the Data Categories annex.

## SCOPE OF APPLICABILITY

3. The Privacy Policy ensures privacy and the protection of personal data of:
  - 3.1. Natural persons / students (including potential, former and current students) as well as of third parties that receive or transfer any information to SSE Riga (including about contact persons, payers, etc.) in relation to the provision of services to natural persons (students);
  - 3.2. SSE Riga visitors (of lecture rooms, offices and other premises), including visitors subject to video surveillance;
  - 3.3. Visitors of websites maintained by SSE Riga;
  - 3.4. Persons subscribing to SSE Riga newsletters;
  - 3.5. Library users.

Hereinafter all of the above are referred to as Data Subjects.

4. SSE Riga shall protect Data Subjects' privacy and personal data and shall respect Data Subjects' right to legitimate processing of their personal data pursuant to the applicable law – the Personal Data Processing Law and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data – as well as other applicable privacy and data processing rules and regulations.
5. The Privacy Policy shall apply to the processing of data irrespective of how and/or in which environment the Data Subject has provided his/her personal data (on the SSE Riga webpage [www.sseriga.edu](http://www.sseriga.edu), by e-mail, on paper or by phone) or in which systems they are processed.
6. Specific types, environments and purposes of data processing (for example, processing of cookies, etc.) may be subject to additional requirements that will be disclosed to the Data Subject when he/she provides the respective data to SSE Riga.
7. SSE Riga shall have the right to amend the Privacy Policy by placing the most recent version thereof on the SSE Riga website. SSE Riga shall keep previous versions of the Privacy Policy, which will also be available on its website.

## DATA CONTROLLER

8. SIA STOCKHOLM SCHOOL OF ECONOMICS IN RIGA (hereinafter SSE Riga), registration no. 40003162751, registered at 4A Strēlnieku Street, Riga, LV-1010, previously and hereinafter referred to as SSE Riga, acts as the personal data controller.
9. Any queries about the processing of personal data should be sent to [office@sseriga.edu](mailto:office@sseriga.edu). Questions about the processing of personal data can be asked by sending an e-mail to this address or in person at SSE Riga. Requests with regard to the enforcement of one's rights can be lodged under Paragraph 24 of this document.

## LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

10. SSE Riga shall process personal data of Data Subjects only on the basis of the following legal grounds:
  - 10.1. Execution and performance of contracts – to enter into an agreement at the request of a Data Subject and to ensure its performance;
  - 10.2. Compliance with applicable law – to ensure compliance with obligations laid down by applicable external rules and regulations;
  - 10.3. Consent of a Data Subject;
  - 10.4. Legitimate interests – to protect legitimate (lawful) interests of SSE Riga arising from mutual obligations or an executed agreement between SSE Riga and a Data Subject or from the applicable law.

## SSE RIGA'S LEGITIMATE INTERESTS

11. The legitimate interests of SSE Riga include:
  - 11.1. Engagement in business activity;
  - 11.2. Provision of education services;
  - 11.3. Provision of library services;
  - 11.4. Engagement in scientific research activities;
  - 11.5. Verification of Data Subjects' identity before the concluding of an agreement;
  - 11.6. Performance of contractual obligations;
  - 11.7. Fostering of mutual relations formation and maintenance between SSE Riga applicants, students, faculty, employees, alumni and representatives of employers;
  - 11.8. Storage of Data Subjects' applications and requests as well as notes on them, including applications and requests submitted verbally, by phone, online and in the self-service environment;
  - 11.9. Performance analysis of SSE Riga websites and development and implementation of their improvements;
  - 11.10. Administration of Data Subjects' accounts on SSE Riga websites;
  - 11.11. Segmentation of the Data Subject database for more efficient provision of education services;

- 11.12. Development and improvement of services;
- 11.13. Promotion of services by means of commercial communications;
- 11.14. Sending other messages about the performance of agreements or other matters of significance thereto, Data Subject surveys about services and their experiences;
- 11.15. Prevention of criminal offences;
- 11.16. Implementation of proper corporate management, financial accounting and analytics;
- 11.17. Ensuring efficiency of SSE Riga management processes;
- 11.18. Improvement of the efficiency of education services;
- 11.19. Improvement of the quality of education services;
- 11.20. Management of payments;
- 11.21. Debt collection;
- 11.22. Dealings with governmental and regulatory bodies and the court to protect its lawful interests;
- 11.23. Public information about SSE Riga's activities.

### **SSE RIGA'S PURPOSES IN PROCESSING PERSONAL DATA**

- 12. SSE Riga processes personal data for the following purposes:
  - 12.1. Provision of education services:
    - 12.1.1. Identification of Data Subjects;
    - 12.1.2. Drafting and concluding of agreements;
    - 12.1.3. Smooth running of the study process;
    - 12.1.4. Development of new study directions;
    - 12.1.5. Handling and processing objections and conducting public opinion research;
    - 12.1.6. Reporting purposes;
    - 12.1.7. Risk management activities.
  - 12.2. Engagement in scientific research activities.
  - 12.3. Provision of library services:
    - 12.3.1. Identification of Data Subjects;
    - 12.3.2. Registration of library users;
    - 12.3.3. Inventory of issued library material;
  - 12.4. Provision of information to governmental bodies and subjects of regulatory activities in cases of and to the extent laid down by applicable external rules and regulations;
  - 12.5. Other specific purposes that will be disclosed to the Data Subject when he/she provides the respective data to SSE Riga.

### **PERSONAL DATA PROCESSING PRINCIPLES**

- 13. SSE Riga shall process Data Subjects' data by means of advanced technologies, considering the current risks to privacy, as well as organisational, financial and technical resources reasonably available to it.
- 14. SSE Riga does not make automated decisions regarding Data Subjects.

15. To promptly ensure quality performance of an agreement with a Data Subject, SSE Riga may authorise its cooperation partners to carry out certain service-related activities. Should the cooperation partners process personal data of Data Subjects at the disposal of SSE Riga during the performance of such services, the cooperation partners shall be considered data processing operators (data processors) of SSE Riga. The latter shall have the right to transfer personal data of Data Subjects to these cooperation partners to the extent needed for the performance of the services.
16. SSE Riga cooperation partners (who act as personal data processors) shall ensure compliance with personal data processing and protection requirements as required by SSE Riga and the applicable law and shall not use personal data for purposes other than the performance of the agreement with the Data Subject (on behalf of SSE Riga).

### **CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

17. SSE Riga shall not disclose personal data of the Data Subject or any information received during the provision of services or term of the agreement to any third parties, including information about any electronic communications, content or other services, unless:
  - 17.1. The data has to be transferred to the respective third party under a contract to carry out a function needed for the performance of the contract or a function delegated by the law (for example, to a bank to make a payment or to provide IT system maintenance services);
  - 17.2. to perform any function required for performance of the contract or delegated by law (for example, to the National Education Information System Provider (VIIS));
  - 17.3. The Data Subject has given clear and unambiguous consent;
  - 17.4. The data has to be provided to individuals as laid down in external rules and regulations, should they make a reasonable request, and pursuant to the said rules and regulations;
  - 17.5. The data has to be provided pursuant to external rules and regulations to protect the lawful interests of SSE Riga, for example, by lodging a claim in a court or other governmental body against a person who has infringed on the lawful interests of SSE Riga.
18. SSE Riga personal data shall not be transferred to third countries (that is, countries outside the European Union and the European Economic Area). In special cases, personal data may only be transferred to third countries or international organisations if the data controller and the processor have complied with the conditions laid down in the Regulation (EU) 2016/679.

### **PROTECTION OF PERSONAL DATA**

19. SSE Riga shall protect Data Subjects' personal data with physical and logical means of protection, relying on advanced technologies and considering current risks to privacy, as well as organisational, financial and technical resources reasonably available to SSE Riga, including:
  - 19.1. Data encryption during data transfer (SSL encryption);
  - 19.2. Firewalls;

- 19.3. Intrusion detection and protection software;
- 19.4. Other means of protection depending on the current technological progress.
20. SSE Riga shall protect Data Subjects' personal data using the following physical security measures:
  - 20.1. Protection of technical resources against the risk of physical impact on information systems;
  - 20.2. Storage of paper documents in lockable cabinets;
  - 20.3. Protection of the stored data from fire, flooding, voltage loss or overvoltage in the mains, theft of technical resources, non-compliant humidity and ambient temperature.

### **DURATION OF PERSONAL DATA STORAGE**

21. SSE Riga shall keep and process personal data of Data Subjects insofar as at least one of the following criteria exists:
  - 21.1. An agreement with a Data Subject is in force;
  - 21.2. SSE Riga or the Data Subject may protect its legitimate interests under external rules and regulations (for example, bring claims or initiate/proceed with an action at the respective court);
  - 21.3. One of the parties has a legal obligation to keep the data;
  - 21.4. The Data Subject's consent to the respective processing of personal data is in effect, unless another legal basis for the processing is in place.
22. After the circumstances referred to in Paragraph 21 expire, the Data Subject's personal data is deleted.

### **THE DATA SUBJECT'S ACCESS TO PERSONAL DATA**

23. The Data Subject shall have the right to receive information laid down by the law in relation to the processing of his/her data.
24. Pursuant to the law, the Data Subject shall also have the right to ask SSE Riga to provide access to his/her personal data as well as to amend, delete or supplement such data or to limit the processing of the said data; the Data Subject shall also have the right to object to the processing of data (including the processing of personal data carried out on the basis of legitimate (lawful) interests of SSE Riga) as well as the right to the portability of data. This right can be enforced insofar as the processing of data does not derive from statutory obligations of SSE Riga that are discharged for the public benefit.
25. The Data Subject may submit a request for the exercise of his/her rights:
  - 25.1. In person in writing to the administration of SSE Riga by producing an identity document;
  - 25.2. By an e-mail signed with a secure electronic signature.
26. Having received a request from the Data Subject regarding the enforcement of his/her rights, SSE Riga shall verify the Data Subject's identity, review the request and satisfy it pursuant to the law.

27. SSE Riga shall send a registered reply to the postal address indicated by the Data Subject or an e-mail signed with a secure electronic signature, taking into account, as far as possible, the Data Subject's preferred means of communication.
28. SSE Riga shall ensure compliance with data processing and protection requirements laid down by the law, and should a Data Subject raise an objection, SSE Riga shall take reasonable action to resolve it. If SSE Riga fails to resolve the objection, the Data Subject shall have the right to approach a supervisory body, namely, the Data State Inspectorate.

### **THE DATA SUBJECT'S CONSENT TO PROCESSING AND RIGHT OF WITHDRAWAL**

29. The Data Subject may provide his/her consent to the processing of personal data on the basis of consent (for example, publishing of an image, advertisement, etc.) in SSE Riga application forms, in SSE Riga service portals/apps, on SSE Riga and other websites (for example, newsletter subscription forms), or in person at SSE Riga.
30. A list of categories of personal data that can be processed according to the Data Subject's consent and other legal bases is available in the Data Categories annex.
31. The Data Subject shall have the right to withdraw his/her content at any time by means of the same method in which it was given or in person at SSE Riga. In this case the processing of data on the basis of consent to the respective purpose shall not be continued.
32. Withdrawal of consent shall not affect processing activities that were completed when the consent was still valid.
33. By withdrawing consent, it is not possible to terminate the processing of data performed on the basis of other legal grounds.

### **COMMERCIAL COMMUNICATIONS AND COMMUNICATION IN GENERAL**

34. SSE Riga shall communicate with the Data Subject using the contact details provided by him/her (telephone number, e-mail address, mailing address).
35. SSE Riga shall communicate about performance of contractual obligations pursuant to the respective agreement (for example, to agree about the timing of lectures, classes, tests, to provide information about payments or changes in services, etc.).
36. SSE Riga shall maintain commercial communication regarding SSE Riga and/or third-party services as well as other communication that is not related to direct provision of contracted services (for example, surveys) pursuant to the external rules and regulations or the Data Subject's consent.
37. The Data Subject may consent to commercial communication with SSE Riga in application forms and on SSE Riga and other websites (for example, in news subscription forms).
38. The Data Subject's consent to commercial communication shall be valid until its withdrawal (even after the expiry of the service contract). The Data Subject may withdraw his/her consent to further commercial communication by:
  - 38.1. Sending an e-mail to [office@sseriga.edu](mailto:office@sseriga.edu);

- 38.2. Expressing it in person at SSE Riga;
- 38.3. Using the automated opportunity provided for opting out of receiving commercial communication and further notices by clicking on the opt-out link at the end of the relevant commercial communication (e-mail).
39. SSE Riga shall cease sending commercial messages as soon as the Data Subject's request is processed. Processing requests depends on technological capacity and may take up to three days.
40. By providing an opinion during surveys and by leaving his/her contact details (e-mail, telephone), the Data Subject agrees that SSE Riga may contact him/her, relying on the contact details provided in the context of the Data Subject's evaluation.

### **USE OF WEBSITES AND PROCESSING OF COOKIES**

41. SSE Riga websites may use cookies. The terms and conditions that apply to the processing of cookies are described in the annex "Cookie Policy".
42. SSE Riga websites may contain links to websites of third parties that have their own personal data protection requirements and terms and conditions of use; SSE Riga may not be held liable for any such requirements or terms and conditions.



Annex to the Privacy Policy of  
SIA STOCKHOLM SCHOOL OF ECONOMICS IN RIGA

## COOKIE POLICY

1. The Terms of Use of Cookies on the SSE Riga website [www.sseriga.edu](http://www.sseriga.edu) describe the use of cookies at SIA STOCKHOLM SCHOOL OF ECONOMICS IN RIGA, legal address: 4A Strēlnieku Street, Riga, LV-1010, registration number 40003162751, e-mail address: [office@sseriga.edu](mailto:office@sseriga.edu), stating the purpose of the use of cookies as well as the right of users to change and choose the use of cookies according to their needs.
2. Cookies are small text files that website browsers (such as Internet Explorer, Firefox, Safari, etc.) save on a user's end device (computer, mobile phone, or tablet), when the user opens a site, to identify the browser or information or settings kept in the browser. Thus, the website is able to save individual user settings and recognise and respond to this user later to improve overall user experience. The user may disable or restrict cookies; however, without cookies it is not possible to fully enjoy the functionality of various websites.
3. Depending on their functions and purpose, SSE Riga uses strictly necessary cookies, functionality cookies, analytics cookies and targeting (advertising) cookies.
4. Strictly necessary cookies are needed for the user to freely visit and browse websites and enjoy full functionality, including the ability to receive information about services and purchase them. These cookies identify a device, but do not disclose the user's identity; they do not collect or compile information either. A site cannot function smoothly without these cookies; for example, it cannot provide the information that a user needs or the services that he/she wishes to purchase from an online store or allow him/her to log in to a profile or request a service. These cookies are kept on a user's device until the respective browser is closed.
5. A website uses functionality cookies to remember user settings and choices so that the site becomes more user-friendly. These cookies are permanently kept on the user's device.
6. Analytics cookies compile information about the use of websites and their most popular sections, including the content that a user opens when he/she browses a site. This information is used for analytical purposes to determine what the users are interested in to improve the functionality of sites and make them more user-friendly. Analytics cookies identify a device, but do not disclose the user's identity.
7. In some cases analytics cookies may be managed by third-party data processors (operators), for example, Google Adwords, on behalf of the site owner and according to the objectives indicated by him/her.
8. Targeting (advertising) cookies are used to compile information about the websites that a user has opened or to offer services that are of interest to a particular user or to send offers that are tailored to a user's interests. These cookies are usually inserted by third parties like Google Adwords with the consent of the site owner and according to the objectives indicated by him/her. Targeting cookies are permanently stored on a user's end device.
9. SSE Riga uses cookies to improve user experience on its websites. This includes:
  - 9.1. Ensuring website functionality;

- 9.2. Adjusting website functionality to user habits, including language, search requests, viewed content;
- 9.3. Gathering statistics about user flows in relation to the site – number, time spent viewing the page, etc.;
- 9.4. Authentication of users.
10. Unless specifically indicated otherwise, cookies are stored until they have fulfilled their purpose; they are deleted later.
11. Cookie data is not transferred for processing to non-EU or non-EEA states.
12. When SSE Riga websites are visited, a window with a message that cookies are used on the website is displayed to the user.
13. By closing the window, the user confirms that he/she has read the information about cookies, their purpose, and cases when their data are transferred to third parties, and consents to them. Thus, cookies are used on the basis of user consent. If the user enters into an agreement on the website, cookies are needed to perform the agreement or for SSE Riga to carry out its statutory duties or safeguard its lawful interests.
14. It is possible to disable or restrict cookies in the security settings of all browsers. But it should be noted that strictly necessary and functionality cookies cannot be disabled, as it is not possible to ensure full functionality of websites without them.
15. If the user has a question about the use of cookies, he/she can contact SSE Riga at the following e-mail address: [office@sseriga.edu](mailto:office@sseriga.edu).

Annex to the Privacy Policy of  
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**DATA CATEGORIES**

No.	Data category	Examples
1.	Personal identification data	Name, surname, identity code/ID, DOB, passport no./ID number
2.	Personal contact details	Address, telephone, e-mail address
3.	Special categories of data (sensitive data)	Disability certificate, employees' compulsory medical examination data
4.	Information about the Data Subject's contact persons	Name, e-mail address, telephone number of the contact person
5.	Data Subject data	Contract number, registration date, status
6.	Data from the <a href="http://www.sseriga.edu">www.sseriga.edu</a> self-service section	User name, activity in the <a href="http://www.sseriga.edu">www.sseriga.edu</a> self-service section
7.	Data Subject profiling <sup>i</sup> data	Affiliation to the post, study course, study programme (profiling takes into account the Data Subject's data analysis permit)
8.	Information about education services	Agreement number, name of study programme, address of campus, tuition fee, discount from tuition fee, expiry of the discount
9.	Study agreement data	Agreement number, execution/approval date, type, annex number, annex date
10.	Communication data	Incoming/outgoing communications, number, date, registrant, content, channel, delivery status
11.	Payment data	Payment agreement number, decision, payment schedule
12.	Data on settlement of payments	Payment system account number, bank account number, invoice number, date, amount, type of delivery, payment date, amount due, debt recovery information
13.	Complaint data	Complaint number, registration/resolution date, type, description
14.	Data Subject survey data	Name of survey, mailing date, response date, questions and answers
15.	Activity on SSE Riga websites	IP address, description of the activity, section of the website, date and time
16.	Photos and images	Photos from events, date when the photos were taken
17.	Video data	Video recordings of events, video surveillance at SSE Riga, recording date
18.	System access data	Usernames and passwords assigned to Data Subjects
19.	Consent <sup>ii</sup> information	Data Subject consent, by topic, date, time and source of consent

<sup>i</sup> Profiling — automated processing of personal data, during which personal information related to a natural person is assessed, in particular to analyse or forecast particulars of performance, economic situation, health, personal wishes or interests, reliability or behaviour, and location or movement as far as such processing results in legal consequences to the natural person or substantially affects him/her in a similar way.

<sup>ii</sup> Consent — clear expression of the Data Subject's will, given freely, allowing SSE Riga to process his/her personal data pursuant to the information it provides.