

Privacy Policy of Wrocław University of Science and Technology

(Document Revision: May 27, 2021)

Contents

1.	Introduction	2
2.	Information on the identity of the data Controller	2
3.	The rights of persons being data subjects	2
4.	Information specific to individual purposes of personal data processing	3
4.1.	Information related to creating an account in the Uniform Student Services System.....	3
4.2.	Information related to the enrolment procedure at Wrocław University of Science and Technology.....	4
4.3.	Information related to the conclusion of an agreement involving Wrocław University of Science and Technology (as the Party receiving data of the personnel of another Party to the agreement)	6
4.4.	Information related to the conclusion of civil law agreements by Wrocław University of Science and Technology with natural persons (mandate agreements, agreements for specific work)7	
4.5.	Information related to events organised with the participation of Wrocław University of Science and Technology.....	10
4.6.	Information related to processing in the promotion of R&D activities of Wrocław University of Science and Technology.....	12
4.7.	Information on the processing of personal data in connection with competitions organised with the participation of Wrocław University of Science and Technology.....	13
4.8.	Information on the processing of personal data of minors and their guardians and parents	14
4.9.	Information related to the processing of personal data in connection with the use of newsletters of Wrocław University of Science and Technology.....	15
5.	Privacy issues in connection with links to third party websites	15
6.	Processing of data from COOKIES files, contact forms, and service logs of Wrocław University of Science and Technology.....	15
6.1.	Information in forms (e.g. at https://pwr.edu.pl/kontakt).....	15
6.2.	Information about cookies – including the use of Google Analytics tools.	16
6.3.	Third-party cookies	17
6.4.	Other information on cookies.....	18
6.5.	Server logs.....	18
6.6.	Sharing data collected by the Website pages.....	18

7.	Final provisions	19
----	------------------------	----

1. Introduction

In pursuance of the requirements included in Articles 13 and 14 of the Regulation of the European Parliament and the Council of the European Union (EU) 2016/679 of April 27, 2016, on the protection of natural persons with respect to the processing of personal data and the free flow of such data, as well as the repealing of Directive 95/46/EC (hereinafter referred to as GDPR), we inform you about the processing of your personal data at Wrocław University of Science and Technology. The University seeks to act in accordance with the GDPR and to protect the rights of EU citizens as well as striving to ensure the protection of individuals whose data is processed in connection with the activities of the controller or the provision of services to them within the EU.

2. Information on the identity of the Data Controller

Within the meaning of the GDPR, the Data Controller is the entity that decides on the purposes for which personal data is processed as well as the means of processing it. The Controller of the data is Wrocław University of Science and Technology, with its registered seat at Wybrzeże Wyspiańskiego 27 in Wrocław. Contacting the Controller's representative is possible by writing a letter to the address of the Controller's registered seat as well as by using the contact form on the webpage pwr.edu.pl/contact. The Controller has appointed a Data Protection Officer, whom you can contact with respect to matters of data protection using the following e-mail address: IOD@pwr.edu.pl or by writing a letter to the Controller's registered office address.

The Controller processes personal data in electronic as well as in paper form and applies relevant procedures (e.g. when making backup copies) with a view to ensuring confidentiality, integrity, and availability. WUST applies the necessary measures and instruments to protect personal data against unauthorised use, access, disclosure, and alteration.

WUST may also store data in electronic form on external and remote servers or in the cloud directly or through entities that ensure an appropriate level of data security.

3. The rights of persons being data subjects

The Controller ensures that the data subjects whose data it processes have the rights as set out in the GDPR. According to the basis of processing, these may be rights to:

- access, correct, and rectify their data,
- erase their data (in the event of withdrawal of consent – if there were no other legal basis for processing),
- restrict the processing of their data if it appeared that the data is unnecessary to us or the processing thereof is objected to by the data subject, or it is incorrect, or if it appeared that it is unlawfully processed; however, the processing cannot be effectively restricted if it is necessary to protect the claims of the Data Controller or the rights of another person, or if it is necessary for important reasons related to the public interest;
- transfer their data by means of a commonly used machine-readable computer format, provided that the Controller processes the data electronically and that it is technically feasible,

- object to the processing on grounds of the data subject's particular situation; this right may be exercised when the data is processed only to pursue the legitimate legal interests of the Data Controller; with regard to data used for direct marketing purposes, it is not even necessary to invoke any particular situation.

Most of these rights are not absolute. Specified below are detailed explanations of the data subject's rights as well as information on how to exercise them. In the event of a request to exercise a specific right, the Controller will respond within one month, but, if necessary, we are entitled to extend this period by a further two months. If the response time is extended, the Controller will notify the data subject of this fact within one month of receipt of the request. The data subject can exercise their rights by contacting us using the contact form specified above. In the event of queries concerning the processing of personal data or the need to exercise your rights under the GDPR, you should contact a representative of the Controller using the means of communication provided in the introduction (e.g. by means of a form on the website), providing your first name, surname, and the address of residence or another address for correspondence. If there is any doubt as to the identity of the person contacting the Controller, additional information or proof of identity may be required.

In justified cases, it will be advisable to contact the persons who collect personal data on behalf of the Data Controller (e.g. through forms). Given the specific activities of the University units, the Data Controller uses relevant information clauses in its endeavour (wherever possible) to make available the addresses or telephone numbers of the relevant contact persons in connection with data subjects' wish to exercise their rights.

Moreover, every data subject has a statutory right to lodge a complaint with the data protection supervisory authority in the Member State of the person's habitual residence, place of work, or the place where the alleged breach occurred. In Poland, this authority is the President of the Office for Personal Data Protection (The President of the PDPO), seated at ul. Stawki 2, 00-193 Warsaw.

4. Information specific to individual purposes of personal data processing

4.1. Information related to creating an account in the Uniform Student Services System

When setting up an account in the USSS, basic data identifying the user is made available to Wrocław University of Science and Technology. This data is needed to manage the user's account and improve communication with them. A USSS account allows the user to complete many steps related to the University activities and its educational offerings. The USSS is an essential contact tool for persons who wish to study at WUST, students, persons enrolling for WUST Academic Comprehensive Secondary School or preparatory courses, and University employees involved in the above activities.

In order to create an account, we need data such as your first name, surname, e-mail address, and PESEL (Civil Registration) number. Persons who do not have a PESEL number will be asked about their nationality and identity document information when setting up an account for enrolling foreigners. As a rule, we do not make this data available to any entities other than the University (except for entities authorised by law, such as the Border Guard, to examine the basis of foreigners' stay in the Republic of Poland). We will process the user's data on the basis of their consent and only until they withdraw their consent by writing a message to the following e-mail address: admin@jsos.pwr.edu.pl. Consent is granted by ticking the relevant box at registration. Consent can be withdrawn and, unless

there are additional circumstances, all data can be erased. We will then not be able to restore or recreate it. Authentication will be required before data is deleted, so the Controller will verify that you are the person entitled to request the erasure of data – for instance, they may ask for your phone number or other data used to create the account.

The mentioned “additional circumstances” are the use of a USSS account for data recording activities or the use of data for purposes other than simply maintaining the account – such as the university admissions process. We will endeavour to keep users informed about any new purposes of using data, which will then be additionally collected, so the USSS user will acquire further information on data processing. The data collected then will be used in other systems and documents of the University. Such data might not be deleted afterwards – even if the USSS user requests it – because it may be subject to, for example, archiving in accordance with applicable regulations which the Data Controller is obliged to observe.

Specific rights of the USSS account user include the right to request that their data be erased (the right to be forgotten).

4.2. Information related to the enrolment procedure at Wrocław University of Science and Technology

The personal data provided to Wrocław University of Science and Technology during the enrolment process are necessary for the performance of a task carried out in the public interest (which should be understood as the establishment and provision of conditions, procedures, and information on the dates of commencement of the enrolment procedure at a public university). This data is also needed to conduct and complete the enrolment process. The provisions that apply here are Article 6(1)(e) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) in connection with Article 70 of the Law on Higher Education and Science.

A positive outcome of enrolment means that the previously provided personal data then continues to be necessary for Wrocław University of Science and Technology for the following purposes:

- provision of educational services (which is then connected with keeping records of studies, issuing identity cards with a photograph, issuing degree certificates, etc., but also, e.g., the University's library records, in accounts opened for students in systems and services provided by external entities, such as e-mail, instant messaging, group work platforms, etc.);
- in connection with the obligation to provide the information required in the aforementioned law to the "POL-on Integrated Information System for Science and Higher Education and Science (e.g. for career monitoring);

Such processing will be necessary for the fulfilment of the Controller's legal obligations (under the Act of July 20, 2018 – the Law on Higher Education and Science and the Regulation of the Minister of Science and Higher Education of September 27, 2018, on degree programmes).

Refusal to provide personal data will prevent the enrolment and commencement of training. The provisions that apply are Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) in connection with Article 49(2), Article 258, Article 342(4), Article 344, Article 345, Article 347, and Article 352 of the Law on Higher

Education and Science and § 6 of the Regulation of the Minister of Science and Higher Education of September 27, 2018, on degree programmes.

Personal data provided to the University may be used to draw up and conclude an agreement involving the person (data subject), the subject of which will be the mutual rights and obligations of the University and the student (in connection with Article 6(1)(b)). In such an event (e.g. when the student participates in an international exchange), the student's data will be processed until the end of the period of limitation of claims related to the execution of this agreement and, for instance, their use of services available at Wrocław University of Science and Technology.

The recipients of the student's data will be public institutions (bodies or entities) entitled to obtain the data on the basis of applicable legislation and the persons appointed by these institutions. During studies (i.e. after the student has enrolled), personal data will also be received by entities evaluating study curricula, auditors, and institutions supervising project execution (if you participate in them) and by entities whose members are students or doctoral students. The necessary information on the student will be provided to the entity involved in the placement or internship organisation. The data of a student participating in international exchange programmes will also be received by the foreign university hosting the student. The recipients of the data may be cooperating entities that provide IT, legal, insurance, and financial services to the Controller.

Student and graduate data is not shared with third parties simply on the basis of profiling or career intermediation needs. The Data Controller shall not regard as reliable any scans and statements which are not signed using an authentication instrument as provided for in European and Polish national law and which are forwarded to it by ordinary e-mail. The student may apply to the University for a certificate and confirmation of official facts known to the University. This can also be done electronically (e.g. using the ePUAP platform, Trusted Profile (Profil Zaufany), qualified signature, and similar tools) and can indicate the address of the recipient of such a certificate; after ascertaining the student's identity, the University may forward information about the student to the indicated recipient.

Foreigners pursuing paid degree programmes at Wrocław University of Science and Technology or scholarship holders from abroad should remember that their data may be made available to scholarship funders as well as to authorised bodies and representatives of their country of origin.

Should student data be subject to transfer to third-country entities (outside the EU) or international organisations, this will be subject to the existence of a relevant legal instrument stating an adequate level of protection such as a decision issued by the European Commission. The student also has the right to receive their own copy of personal data transferred to a third country.

A candidate who joins the enrolment process retains most of the rights they have had since the creation of their USSS account. However, they lose the right to request the erasure of their data because once the enrolment process begins, the aforementioned legal obligations and interests of the Data Controller will have occurred, which will make it necessary for the Data Controller to process the candidate's personal data – e.g. for archiving or accounting purposes.

A candidate joining the enrolment process should also know the following:

- when joining the enrolment process at Wrocław University of Science and Technology, they take responsibility for the correctness of the data entered into the system – in particular, the data important for the outcome of the enrolment process and the decision of the Enrolment Committee;
- they acknowledge that Wrocław University of Science and Technology will not accept any responsibility for any false data provided or as a result of false or inaccurate statements made;
- they understand that a USSS account is a primary tool for collecting information about the candidate (along with documents submitted in person) and that information provided to the candidate via the USSS or by e-mail will be considered as correctly delivered;
- they should protect the login data received from the University (this particularly applies to protection against disclosure to unauthorised persons) and, if the data is disclosed, may be liable for the use thereof;
- the postal address they provide (in the “address for correspondence” section) will be the delivery address to which all correspondence from the University will be sent in paper form, including, in particular, administrative decisions concerning the applicant or student;
- by joining the enrolment process, they accept the provisions of this Privacy Policy of Wrocław University of Science and Technology and acknowledge that they have read it.

4.3. Information related to the conclusion of an agreement involving Wrocław University of Science and Technology (as the Party receiving data of the personnel of another Party to the agreement)

Under the law, the Data Controller is entitled to process the personal data of individuals who enter into an agreement with it (to prepare such an agreement for conclusion and performance) in connection with Article 6(1)(b) of the GDPR. The processing may also be related to an agreement in which the personal data is only contained (e.g. personal data of entrepreneur representatives, data of the contact person indicated in the agreement, data of persons with whom the content of the agreement is agreed, etc.). Such data is received from other Parties to agreements entered into with the Data Controller – usually the employers of the individual concerned. This means that Wrocław University of Science and Technology also receives data of persons who are not parties to the agreement, but whose data is necessary to draw up the agreement e.g. with the entity employing the person concerned or the entity which that person represents. This is, in general, basic data revealing the data subject's first name, surname, job title or responsibilities, the scope of authority (e.g. power of attorney), and contact details (e-mail address or telephone number and address of the place of work). This is needed to maintain contact in connection with the agreement and may reveal the person's role in the performance of the agreement.

The Data Controller strives to minimise the scope of data collected, but if precise identification of identity is required (and only if a natural person is a Party), then not only basic data can be processed, but also data identifying a person, such as date of birth or PESEL (Civil Registration) number (e.g. necessary to assert claims resulting from signed commitments or agreements).

The basis for processing such personal data may thus be the necessity to, as appropriate in particular situations:

- fulfil a legal obligation incumbent on the University (Article 6(1)(c) of the GDPR);
- perform a task conducted in the public interest (Article 6(1)(e) of the GDPR);
- pursue the Controller's legitimate interests resulting from the need to correctly identify the persons authorised to represent the parties to the Agreement, for the purposes of contacting the indicated person, asserting any claims to which the Controller is entitled or made against it, or defending itself against these claims (Article 6(1)(f) of the GDPR).

Where personal data is processed on a basis other than consent, the data subject does not have the right to withdraw their consent and request erasure of data ("the right to be forgotten"), but they may have the right to restrict the processing of their data as well as retaining most of the rights mentioned before. Prior to exercising these rights, it may be necessary to verify the identity of the person making such a request.

As a public university, the Controller is subject to various obligations relating to documentation, archiving, reporting, and even public disclosure of certain information. The University's activities are monitored, audited, and inspected by authorised institutions, which often involves providing such institutions with information (including personal data).

Personal data is processed by persons authorised in writing by the Data Controller (mainly employees) and only to the necessary extent specified in the University's internal regulations. Personal data may be made available only in justified cases to cooperators and providers of outsourced services used by the Data Controller (law firms providing services to the University, consultants and auditors, as well as debt collection and IT companies) and their employees. This may happen when they provide the University with services that require access to data.

Personal data is processed for the minimum period necessary for the performance and financial settlement of the Agreement. The data is then archived. In cases where an individual is a Party to an agreement, the period for which their data is processed results from tax regulations, statutes of limitation, and sometimes from the contractual obligation of confidentiality (if the Parties are bound by such an agreement).

4.4. Information related to the conclusion of civil law agreements by Wrocław University of Science and Technology with natural persons (mandate agreements, agreements for specific work)

The Controller of the data related to any civil law agreement being concluded is Wrocław University of Science and Technology with its registered seat in Wrocław, ul. Wybrzeże Wyspiańskiego 27, 50-370 Wrocław; a representative of the Controller can be contacted by means of the contact form available on the webpage <http://pwr.edu.pl/kontakt>; The Controller has appointed a Data Protection Officer who can be contacted at iod@pwr.edu.pl. In case of queries regarding the processing of personal data, a representative of the Controller can be contacted via the form on the website; the querier must prove their first name and surname, address of residence or another contact address and – in the case of representatives – indicate the entity on behalf of which the

representative acts or acted, in order to correctly identify the data subject and respond to the notification. If there is any doubt as to the identity of the person contacting the Controller, additional information or proof of identity may be required.

Whenever civil law agreements are concluded, in the vast majority of cases, the Controller processes the following categories of data: identification data (first name, surname, if necessary – the company or entity represented by the individual signing the agreement, role/position held, e-mail address, or telephone number). As far as persons representing the Party are concerned, the PESEL (Civil Registration) number or identity document data or address data identifying the individual signing the agreement as authorised to represent the Party are also processed. If the individual is a Party to an Agreement, the bank account number for financial settlements, NIP (taxpayer ID no.) or REGON (National Official Business Register no.), and registered office/residence address are also processed. Personal data is processed for the purpose of concluding and performing the Agreement, making financial settlements, archiving documentation related to the conclusion and performance of the Agreement, and handling claims, if necessary. Such data will not be subject to automated decision-making, including profiling.

The individual's data will be processed on the following basis:

- a) a signed Agreement or an Agreement entered into by the entity represented by the individual or for which the individual acts (Article 6(1)(b) and (f) of the GDPR);
- b) the legal obligation to keep records arising from the provisions on accounting and the Tax Ordinance (Article 6(1)(c) and (f) of the GDPR);
- c) the Controller's legitimate interests resulting from the need to correctly identify the persons authorised to represent the parties to the Agreement, for the purposes of contacting the indicated person, asserting any claims to which the Controller is entitled or made against it, or defending itself against these claims (Article 6(1)(f) of the GDPR).

The Controller processes personal data that has been provided to it:

- a) by a person who is a Party to an Agreement, or
- b) by another person acting on behalf of a Party to an Agreement, or
- c) by a third party, e.g. an employer or an entity represented by an individual, in connection with an Agreement entered into with the Controller.

The Parties' personal data may be transferred/shared with entities authorised by law, entities providing advisory and auditing services, law firms, other entities in connection with those entities' provision of support for the Controller's day-to-day operations, software suppliers and software maintenance providers, as well as companies providing postal or parcel delivery services. Each time, the extent of the information disclosed to these entities will be adequate and necessary for the achievement of the assumed objectives. Personal data may also be transferred outside the European Economic Area in connection with the provision of IT services by these entities, as well as to third parties – on the basis of an agreement concluded with these entities for the entrustment of the processing of personal data based on so-called Standard Contractual Clauses. When using the services of the above-mentioned third parties to which we may disclose data, the Controller obliges these parties to maintain the security and confidentiality of the data and to make it unavailable to unauthorised entities, and these parties will observe relevant security standards to meet the requirements of the GDPR.

Data will be processed for the period necessary for the execution of the Agreement and for the period of limitation of claims resulting from the legal provisions concerning the Controller, as this is necessary for the fulfilment of the objectives resulting from its legitimate interests.

Data will be processed in order to demonstrate the fulfilment of notification obligations and for the purpose of fulfilment of record-keeping obligations under the applicable regulations on accounting and the Tax Ordinance. As a general rule, this will be a period of 5 years, starting from the end of the calendar year in which the time-frame for payment of the tax elapsed.

Data subjects' rights – The data subject has the following rights with respect to their personal data, which apply according to the circumstances: the right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to portability, and the right to object to processing. Most of these rights are not absolute. Specified below are detailed explanations of the data subject's rights as well as information on how to exercise them. In the event of a request to exercise a specific right, the Controller will respond within one month, but, if necessary, we are entitled to extend this period by a further two months. If the response time is extended, the Controller will notify the data subject of this fact within one month of receipt of the request. The data subject can exercise their rights by contacting us using the contact form specified above.

The data subject may ask the Controller whether it processes such data. If such data is processed, the data subject has the right to request access to such personal data and information such as the purpose of the processing, the categories of personal data being processed, the recipients or categories of recipients, the expected duration of storage of such data wherever this can be determined (or the criteria based on which the duration of storage is determined), as well as the right to request rectification or erasure of their personal data or the restriction of its processing and the right to lodge a complaint with the relevant supervisory authorities; if the Controller has not received the data from the data subject, any available information on the source of the data may be requested. The data subject may also ask whether the Controller makes any automated decisions using their data that could have legal or other important consequences for them.

The data subject may ask the Controller to correct the data if it is incorrect. Given the purpose of the processing, they may also request that incomplete data be completed.

The data subject may object to the processing of their personal data on the basis of the legitimate interests of the Controller, who will respect the objection and stop the processing unless:

- a) there are compelling legitimate grounds for the processing which override the person's interests, rights, and freedoms; or
- b) The Controller must continue processing personal data in order to establish, enforce, or defend a legal claim.

The data subject may request the restriction of the processing of their personal data in the following circumstances:

- a) for the time needed for the Controller to determine the accuracy of that data where its accuracy is questioned;
- b) if data is processed unlawfully, but the data subject wishes to restrict the use of their data rather than erasing it;

- c) if the Controller no longer needs the data, but the data subject needs it in order to establish, exercise, or defend legal claims;
- d) for the time needed for the Controller to determine whether there are compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the person objecting to the processing.

Where the data subject's request restricts the processing of their personal data, the Controller will retain the data and process it only with that person's consent; for the establishment, exercise, or defence of legal claims; for the protection of the rights of another individual or legal person; for an important public interest of the European Union or a Member State.

The data subject whose personal data is processed by the Controller has the right to lodge a complaint with the supervisory authority responsible for personal data protection in the Member State of their habitual residence, place of work, or place where the alleged infringement occurred. In the Republic of Poland, this authority is the President of the Office for Personal Data Protection (the President of the PDPO).

4.5. Information related to events organised with the participation of Wrocław University of Science and Technology

Wrocław University of Science and Technology (WUST) as a Data Controller is also an organiser or co-organiser of conventions, scientific conferences (including student conferences), trade fairs, industry and discipline-specific meetings, and similar events. The Data Controller organises various events promoting science, as well as events in social media and traditional media (radio, TV, press). Participants in such events are asked to provide details that identify them and their contact details. This Privacy Policy also aims to inform participants in such events about when and how their personal data is processed and what it is used for in practice.

When someone decides to participate in an event organised by WUST, their personal data is collected. Typically, the scope of the data includes, in particular, first name and surname, postal address, e-mail address, telephone number, and other contact details, organisational affiliation and, if necessary, other data – such as specific dietary expectations or need for other forms of support from the organiser, accommodation details, payment methods and credit card information for hotel bookings, etc. – needed for the organisation of the event. If the participant in the event does not enter into an agreement with the Data Controller, the basis for the processing of the data will be the participant's consent (in connection with Article 6(1)(a) of the GDPR).

If relevant regulations, registration rules, or the very nature of the event (e.g. a ticketed career expo) prevent one from assuming that the provision of data is tantamount to giving consent to its processing, the Data Controller will ask for separate, additional consent to the processing of personal data for specific purposes.

Personal data of participants in specific events may also be shared with other co-organisers of the event since, as a rule, institutions of the scientific world actively cooperate in such activities.

Participants' data may be used to register their participation, make materials available, provide additional services, and provide communication services (it may be made available to providers of services such as e-mail, instant messaging, etc.).

Participants' likeness and voice may be recorded in the form of photographic and video material and used on the organisers' websites and in press reports. If the participant does not wish to disclose their identity and does not accept the use of such data, they should – before sharing their information – confirm the possibility of opting out of such processing of their data with the organiser's representative.

Participants' data may also be made available to sponsors and used to enable the presentation of offers, but – as a general rule – (unless the organiser informs otherwise) these will be the purposes of other data controllers. WUST stores and uses personal data:

- to maintain contact with data subjects and respond to queries;
- to provide organisational assistance, as well as information, accommodation and catering services;
- to inform participants of the status of the event in which they are interested;
- to provide information on other, additional services;
- to comply with legal obligations;
- to make the activities of the Data Controller more attractive and examine the expectations or satisfaction of participants;
- to monitor visits to webpages dedicated to events;
- to provide the user with assistance and ensure services related to the event.

Failure to provide the personal data necessary for the above purposes may result in the Data Controller failing to carry out the activities described above; also, it might be impossible to achieve purposes such as contacting the participant using their unique e-mail address.

Personal data will be processed by WUST for the period necessary to fulfil the purposes specified above, after which it will be anonymised and destroyed or archived. The organiser of the event may ask participants to agree to have their data saved for future notifications, e.g. about future editions of the event or similar events.

The Controller (WUST) does not disclose personal data to third parties for any purpose other than the purposes specified herein and, in particular, for the purpose of enabling them to send unsolicited marketing material. However, we may use and share non-identifying data – pseudonymised or altered data or aggregated information – for research, reporting, or statistical purposes.

WUST does not disclose personal data to entities not involved in the organisation of its events. If the event in which you are participating or intend to participate is outside the European Union and it is necessary to provide data, the Data Controller will do its utmost to ensure that this is done on the basis of relevant legal instruments which guarantee that the participant's personal data will be protected no worse than within the EU. The Data Controller informs that the participant may decide on their own on the disclosure of their data to entities that are not obliged to comply with European law when processing personal data.

Only those persons to whom such access is necessary for the performance of a role or task have access to their personal data.

As a matter of principle, the Data Controller accepts that data subjects provide it only with their own data. Providing the Controller with someone else's personal data is permissible if the person who provides the data does so with the consent of the data subject. When providing someone else's data, reasonable measures should therefore be taken, which may include informing the person being enrolled of the principles set out in this policy.

Information systems and event websites may contain links to third party websites. These other websites are not subject to this Privacy Policy and the procedures of the Data Controller. When using them, you should be extremely careful and read the terms of use and privacy policies available there. The Data Controller does not practice the general endorsement, approval, or certification of anyone's services, nor does it recommend the services or products offered on third party websites – even if its activity involves providing information about them.

WUST does not store customer credit or debit card information – to process payments related to the University's events, we use an external provider who ensures that online payments are handled securely and provides an appropriate tool to perform such activities (an online portal).

4.6. Information related to processing in the promotion of R&D activities of Wrocław University of Science and Technology

At Wrocław University of Science and Technology, special care is taken to establish and maintain good relations with entrepreneurs, industry, and business. The University is active in establishing relations with entrepreneurs by sending them proposals to initiate cooperation in the area of research, organise meetings and conferences, and present the possibilities of using the infrastructure available at the University. For this purpose, data from publicly available sources is used, such as company websites and public registers – Central Registration and Information on Business (CEIDG) and National Court Register (KRS). Some of the data comes from entrepreneurs when they establish cooperation with the University – even if there is no agreement in this respect.

The scope of data in such circumstances includes, in particular, company name (including first name and surname for sole traders), postal address, e-mail address, telephone number, and other data for segmentation purposes (such as main PKD code or voivodship). Such processing is necessary for the purposes arising from our legitimate interests and in accordance with the premise of Article 6(1)(f) of the GDPR. The specific purposes of data processing in this case are as follows:

- to establish business relations with respect to the research and technology offerings of WUST and maintain business relations with companies and institutions;
- to conduct research and analysis of entrepreneurs' needs in terms of R&D;
- to disseminate knowledge about events organised with the participation of WUST at the junction of business and science;
- to monitor our websites and tailor the University's offerings to the expectations of the world of business and the economy;
- to enable electronic messaging and feedback management involving our trusted partners and processors acting on our behalf;

- to comply with legal obligations and internal procedures, among other things, to ensure accountability and the exercise of the data subject's rights with respect to privacy protection and data processing supervision.

The Controller is assisted in maintaining such contact by other entities that guarantee an adequate level of data security. This cooperation essentially consists in handling, storage, and management of e-mail messages. The data is transmitted to them with due care and confidentiality and only to the extent necessary for the technical handling of the dispatch. Contact details are not made available to anyone for any purpose other than that specified above. We do not consent to your data being passed on to any entity that may send you unsolicited commercial information. We aim to process data that does not reveal anyone's identity (pseudonymised, altered, aggregated, or otherwise processed) and only for research, reporting, or statistical purposes.

The Controller acts in accordance with the GDPR, EU law, and Polish national law. In the event of receiving an unsolicited message, if the data subject does not wish such processing to take place, they may restrict the processing of the data by the Controller by sending an e-mail to the following address dlaprzedsiebiorcy@pwr.edu.pl (The Data Controller informs that verification of the data may be necessary before the request can be carried out).

4.7. Information on the processing of personal data in connection with competitions organised with the participation of Wrocław University of Science and Technology

Wrocław University of Science and Technology is the organiser and co-organiser of many competitions, contests, rankings, and similar events related to its activities. Their rules are usually laid down in relevant regulations. Importantly, they cannot be carried out without at least a minimum extent of data processing.

The organiser of the competition will normally intend to publish the results and information about the winners – also on the Internet, using the likeness of the winners or participants. Participants' data will be made available to persons involved in the competition procedures, including authorised University staff. The data may also be made available to employees of companies and institutions involved in the organisation of the competition, also on their websites. If such entities are also co-organisers of the competition, the participant can usually obtain separate information from them about the data processing. Institutions and entities authorised to supervise the University's activities may also become recipients of personal data. As far as this is reasonable, legally permissible, and technically feasible, the Controller will endeavour to anonymise the data in such cases.

Entering a competition involving the submission of personal data is, in principle, tantamount to acknowledging consent to the processing of personal data in connection with the competition, in connection with (Article 6(1)(a) of the GDPR).

Competition documentation may subsequently be subject to archiving obligations based on the common provisions applicable to higher education. This may lead to the disclosure of competition documentation, including information about the winners, to authorised persons and institutions. Such processing will be necessary for the purposes arising from the legitimate interests pursued by the Data Controller (Article 6(1)(c) of the GDPR).

Under the competition procedures, personal data will be processed from their collection until the end of the month following the month in which the competition results are announced.

If the data of the winners (persons awarded by the competition committee) are made public, it will be processed in this way indefinitely. It may be publicly accessible until replaced by data concerning new winners and may also be archived. The Controller reserves the right to archive competition entries together with information about their authors for later exhibition, display, or publication in accordance with the copyright acquired. In the event that information or reports relating to a competition are published (in the press or in social media), the participants' personal data, including their likeness, will be publicly available for the period during which such reports are made available to their recipients (as appropriate to the medium).

In addition to other rights mentioned before, due to the fact that data processing is based on consent, the participant also has the right to withdraw it. To withdraw their consent, the participant must contact the Competition Organiser. The withdrawal of consent will not affect the lawfulness of the activities carried out with respect to the data before the withdrawal, but it may prevent the completion of competition procedures involving the participant who has withdrawn their consent. The provision of personal data is voluntary but necessary to enable interested parties to take part in competition procedures; therefore, the absence of consent will prevent them from taking part in the competition (which, by its very nature, is also voluntary).

4.8. Information on the processing of personal data of minors and their guardians and parents

As a Data Controller, Wrocław University of Science and Technology processes personal data concerning minors – e.g. in connection with enrolment to the Academic Comprehensive Secondary School of WUST and preparatory courses and classes popularising science among children and youths. The purpose of processing such data is to organise and conduct enrolment to the classes, enable eligible persons to participate in the classes, and provide them with related benefits or services.

The University needs names and contact details in order to be able to contact course participants about matters including course organisation, as well as parents or guardians – to notify them of urgent matters relating to the child if it is necessary to protect the child's health or safety. Consent for the processing of personal data on behalf of minors is given only by the parents or legal guardians of the participant.

In such cases, the following may become recipients of personal data: institutions cooperating with the Controller – including sponsors, institutions funding projects conducted by the School, schools, chief education officers and educational institutions, accredited laboratories, and government administration bodies, etc. The data of the participants, as well as the data of their guardians and parents, may be made available to entities providing services to the University – e.g. IT or auditing services.

The data of minors will be processed for a period dependent on the consent of their parents or guardians. The Data Controller will also delete them immediately when the reason justifying their processing ceases to exist – e.g. the university preparation course ends or the data of candidates to the Academic Comprehensive Secondary School is transferred to the school authorities. If retention of data is required by regulations with respect to archiving, such personal data will be retained for the period specified in the regulations.

The Data Controller will, where necessary, ask the parents or guardians of a minor to give separate, additional consent to the processing of their data and the data of their charges.

4.9. Information related to the processing of personal data in connection with the use of newsletters of Wrocław University of Science and Technology

Providing personal data in order to receive newsletters of Wrocław University of Science and Technology is voluntary; however, without providing such data it will be impossible to deliver the newsletter issues. Personal data is processed exclusively to deliver the requested information to the indicated e-mail address. The newsletter user's provision of their data is tantamount to the provision of consent (in connection with Article 6(1)(a) of the GDPR).

The use of the newsletter is voluntary and free of charge. Registration in the database is effected by completing the form available on the webpage <https://pwr.edu.pl/newsletter>.

The user can delete their data from the database and unsubscribe at any time using a link provided in each issue of the newsletter.

For technical matters and issues concerning the exercise of data rights, please write a message to the following address: info@pwr.edu.pl

5. Privacy issues in connection with links to third party websites

The websites and information systems managed by the Data Controller may contain links to third-party websites that are not subject to our privacy policy and procedures. This includes access to various resources and knowledge bases provided by or through Wrocław University of Science and Technology on the basis of relevant licence agreements.

We cannot be held responsible for the privacy practices of these websites and this Privacy Policy applies only to Wrocław University of Science and Technology websites.

The Data Controller does not practice advertising or endorsing services or products offered by third parties, nor does the Controller carry out any approval or certification of services provided by such third parties. It is advisable to carefully review such services as well as read the relevant privacy policies and terms of service of such services before using them.

6. Processing of data from COOKIES files, contact forms, and service logs of Wrocław University of Science and Technology

Wrocław University of Science and Technology attaches great importance to respecting the privacy of users visiting its Website (the Website should be understood as various websites available in the domain [.pwr.edu.pl](https://pwr.edu.pl).) The website operated by Wrocław University of Science and Technology collects information about users and their behaviour in the ways described below:

- Using information voluntarily entered in **forms**.
- By storing **cookie files** (so-called "cookies") on end devices.
- By collecting **logs** on the WWW server located at Wrocław University of Science and Technology.

6.1. Information in forms (e.g. at <https://pwr.edu.pl/kontakt>)

- Information provided voluntarily by the user is collected.

- Information on connection parameters (timestamp, IP address) may be stored
- The data entered in the form is not made available to third parties without the user's consent.
- The data provided in a form may constitute a set of potential recipients of information sent by Wrocław University of Science and Technology in connection with its statutory activities.
- The data provided in forms is processed for purposes relevant to the function of the specific form, e.g. replying, providing data, making an offer, etc.
- Data provided in forms may be made available to entities providing certain services, e.g. it concerns information about the holder of a registered domain provided to entities such as Internet domain operators or payment services.

6.2. Information about cookies – including the use of Google Analytics tools.

Wrocław University of Science and Technology uses cookies. Cookie files constitute digital data, text files in particular, which is stored on the Website user's end device and applied so that the user can use the Website's pages. Usually, cookies contain the name of the website from which they come, the time for which they are stored on the end device, as well as a unique number.

The entity placing cookie files on the Website user's end device and obtaining access to them is Wrocław University of Science and Technology. They are used for the following purposes:

- generating statistical data that helps us understand how the Website's users use websites, which makes it possible to improve their structure and content;
- retaining the Service user's session (after logging in), thanks to which the User does not have to enter their login and password on each subpage;
- profiling the user in order to show them tailored content in advertising networks, in particular the Google network.

Two basic types of cookie files are used by the Website: session cookies and persistent cookies.

- Session cookies are temporary files stored on the user's end device until they log out, leave the website, or close the software (Internet browser).
- Permanent cookie files are stored on the user's end device for a time determined in cookie files' parameters or until they are deleted by the user.

Software for browsing websites (Internet browser) allows cookie files to be stored on the user's end device. Users of the Website may change their settings in this respect. The Internet browser allows the user to delete cookies. It is also possible to block cookies automatically. Users should refer to the "help" section or documentation of their Internet browser for details. Such information is available on webpages including these:

- [Chrome](#)
- [Safari](#)
- [Firefox](#)
- [Opera](#)
- [Windows Phone](#)

Restrictions on the use of cookies may affect some of the functionality available on the webpages of Wrocław University of Science and Technology, e.g. limit options dedicated to storing settings or passwords. Disabling cookies necessary for authentication, security, and maintaining user preferences may make it difficult, and – in extreme cases – impossible, to use the webpages.

Cookies placed in the Website user's end device may also be used by advertisers and partners cooperating with the Data Controller.

Cookies may be used by advertising networks, in particular the Google network, to display advertisements adjusted to the way the user uses the Website. For this purpose, they may store information about the user's navigation path or the time spent by them on a particular page.

Cookies help Wrocław University of Science and Technology to develop statistics for the pwr.edu.pl website. Full information on how they work as well as the Google Analytics privacy policy can be found [here](#) and [here](#).

We also publish our material in places such as YouTube, Facebook, Twitter, and LinkedIn. These online services may also use cookies, which enable the user to log in but are also used to display advertisements corresponding to the preferences of the user visiting our pages and profiles.

6.3. Third-party cookies

In addition to our own cookies, third-party cookies may be placed and used on our websites, in particular those belonging to advertisers and operators of viewing analysis and reporting systems.

Third-party cookies are typically used for the following purposes:

- to collect statistical data on the popularity and usability of individual pages of the Websites or their components;
- to display behavioural advertising – tailored to users' interests;
- to create users' behavioural profiles, in particular, to avoid the repeated presentation of the same advertisement to the same recipient and to present behavioural advertisements with the recipients' interests in mind;
- to ensure technical support for third-party components, such as Adobe Flash or Facebook Connect.

For uniform font representation, some pages of the Website use so-called web fonts provided by Google. When our website is called up, the visitor's browser loads the required web fonts into the browser cache in order to correctly display the font types we selected and thus the text on the webpage; in order to do this, the browser which you use must connect to Google servers. As a result, Google learns that one of our website addresses was called up on your device with a unique identifier.

The legal basis for the processing of personal data regarding the unique identifier of your browser or device is the legitimate interest of the Controller consisting in maintaining a coherent and attractive presentation of our online services by using Google Fonts.

The user of the Website can set up their browser so that the fonts are not loaded by Google servers (for example, by installing add-ons). If the browser does not support Google fonts or if access to Google servers is blocked, the text will be displayed using the standard system font. However, our website will be no longer consistent with our screen design. For more information about Google services, please see Google Privacy Policy: <https://www.google.com/policies/privacy/>

6.4. Other information on cookies

We use cookies (such as utma, utmb, utmc, and utmz_ as well as geolocation information, i.e. we check from which location (e.g. continent or country) our Website is called up.

Our website uses the Google Tag Manager tool to manage the embedded analytics codes, used to analyse user traffic on the website to optimise it. We use Hotjar codes to analyse anonymised user behaviours on the website, which allows us to optimise website usability. We use the Facebook Pixel code to measure the effectiveness of ads based on analysis of users' actions on the Website.

6.5. Server logs

Information about certain behaviours of our Website users is recorded at the server layer. This data is used to administer the site and to ensure that services are provided safely and as efficiently as possible.

Viewed resources are identified by URLs. Moreover, data that may be recorded includes the following:

- query arrival time,
- time taken to send a reply,
- client station name – identification with the HTTP protocol,
- information on errors that occurred during the execution of HTTP transactions,
- URL address of the website previously visited by the user, in cases where the Website has been accessed via a hyperlink,
- information on the user's browser, IP address, and "MAC address",

The above data is not used by Wrocław University of Science and Technology to identify persons browsing the pages – it is used for server administration purposes.

6.6. Sharing data collected by the Website pages

Data is made available to third parties only to the extent permitted by the law and for the purposes established by Wrocław University of Science and Technology.

In order to share data that allows for the identification of an individual, the Data Controller obtains the data subject's consent. When opening the pages of the Website of the Data Controller, the user should read the information on the information collected in connection with the use of the Website and, if necessary, adjust the settings of their browser accordingly.

The Data Controller may have an obligation to provide information collected by its Website to authorised bodies on the basis of lawful requests to the extent arising from a specific request.

7. Final provisions

The Privacy Policy may be supplemented or updated in accordance with the current needs of the Data Controller in order to provide up-to-date and reliable information to users regarding their personal data and information.

The current content of the Privacy Policy is made available on an ongoing basis, the Data Controller's dedicated website.