

DATA PRIVACY POLICY

APPLICANTS, STUDENTS AND ALUMNI

WELCOME

With this information we would like to explain to you how and for which purposes we use your personal data in connection with your studies at RIT Croatia and which rights and options you have in this respect.

WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

RIT Croatia, Don Frana Bulića 6, 20 000 Dubrovnik, will be the primary responsible controller for your personal data. In addition, other RIT Global entities may control your personal data to the extent we are required or permitted by law to share your personal data with them for the purposes described below.

Data Controller

Name	RIT Croatia
Address	Don Frana Bulića 6
City	20 000 Dubrovnik
Country	Croatia
Telephone number	020 433 000
email	student.services@croatia.rit.edu

Data Protection Officer

Name	Ivona Labaš Director of Strategic Development, ITS & Facilities
Job Title	
Address	Don Frana Bulića 6
City	20 000 Dubrovnik
Country	Croatia
Telephone number	020 433 000
email	dpo@croatia.rit.edu

FOR WHICH PURPOSES DO WE USE YOUR PERSONAL DATA?

We will process your personal data as required in connection with your studies at RIT Croatia, in particular for the following purposes:

Potential students:

- Informing you about studies at RIT Croatia, student life, enrollment process, brochures and other promotional materials by using telephone, post and electronically (SMS, email, Viber, Whatsapp, Social Media, etc).
- Advising you about Scholarship and Financial Aid opportunities.
- Administering your application to RIT Croatia and assigning your University ID number.
- Assessing your eligibility to apply for studies with RIT Croatia and complying with relevant laws and regulations set by the Ministry of Science and Higher Education and Youth.
- Monitoring and assessing satisfaction with regards to previous studies, academic policies, student life activities, continuation of studies, and developmental activities.
- Security purposes, including ensuring integrity and security of and controlling access to our premises, secured websites and applications websites Monitoring and assessing compliance with our policies and standards.

Students:

- General student administration, including course schedules, course assignment, grade processing and other diploma related activities.
- Advising you about Scholarship and Financial Aid opportunities
- Advising you about Study Abroad and Erasmus opportunities.
- Contacting you about your outstanding dues or overpayments.
- Career planning and development, cooperative education employment opportunities, guidance for employment opportunities, communication with your employers to ensure proper grading.
- Academic advising to ensure proper academic guidance during your studies at RIT Croatia.
- Advising you and your families about upcoming college events, student life, Study Abroad/Erasmus opportunities (direct communication, email, social media, and via printed newsletter).
- Any potential Academic or Disciplinary Actions hearings and cases.
- Security purposes, including ensuring integrity and security of and controlling access to our premises, IT and communication systems, platforms and secured websites and applications websites and other systems or facilities (including monitoring by camera or other means of surveillance), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities.
- Legal documentation purposes, to ensure compliance with legal documentation and document retention obligations (such as archive and record keeping obligations).
- Monitoring and assessing student satisfaction with regards to academic policies, student life activities, continuation of studies, developmental activities.
- Monitoring and assessing compliance with our policies and standards.

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Alumni:

- General alumni networking database administration, including gathering your contact info, work place data and additional education information.
- Advising you about further education opportunities at RIT Croatia.
- Advising you about career opportunities, career planning and development.
- Advising you about Scholarship and Financial Aid opportunities for continuing education.
- Contacting you about your outstanding dues or overpayments.
- Advising you about benefits programs and other activities that are essential for Alumni Association functioning.
- Security purposes, including ensuring integrity and security of and controlling access to our premises, IT and communication systems, platforms and secured websites and applications websites and other systems or facilities (including monitoring by camera or other means of surveillance), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities.
- Legal documentation purposes, to ensure compliance with legal documentation and document retention obligations (such as archive and record-keeping obligations).
- Monitoring and assessing satisfaction with regards to previous studies, professional activities, continuation of studies, and developmental activities.
- Monitoring and assessing compliance with our policies and standards.

Employees, external collaborators, and independent contractors:

- Fulfilling employment contracts, service contracts and independent contractor agreements in line with national employment laws and regulations
- Publishing your data through the faculty and staff directory via official RIT Croatia website (consent based).
- Advising you about education, professional development and research opportunities at RIT Croatia.
- Advising you about RIT Croatia benefits and activities.
- Security purposes, including ensuring integrity and security of and controlling access to our premises, IT and communication systems, platforms and secured websites and applications websites and other systems or facilities (including monitoring by camera or other means of surveillance), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities.
- Legal documentation purposes, to ensure compliance with legal documentation and document retention obligations (such as archive and record-keeping obligations).
- Monitoring and assessing satisfaction with regards to employment and cooperation with RIT Croatia
- Monitoring and assessing compliance with our policies and standards.

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WHICH PERSONAL DATA DO WE COLLECT?

Unless otherwise agreed with you, we will collect only personal data which are required in connection with our business relationship for the above purposes. This typically includes the following categories of data:

- Personal details, such as name, address, date of birth, emergency contact details, gender, country of residence, citizenship, national health insurance number, OIB and tax related details if necessary.
- Information about your high school studies and previous college records including grades and information regarding any disciplinary processes.
- Information about your finances, family employment status and family finances if you apply for our financial aid programs.
- Degree continuation related information processed in connection with your enrollment or voluntarily provided by you, such as alternate email addresses, information about your personal and professional life, etc.
- Identification documentation, such as details of your passport, driving license, national or work ID card, or other documentation required by law (which may include photographs of your face).
- Identification and other employment-related documents, such as details of your national or work ID card, tax status, bank account numbers or other documentation required by law (which may include photographs of your face) for the purposes of fulfilling your employment or service contract.
- Professional details where applicable or necessary to aid in your career development, such as your work contact details, position and career data, CV, details of your qualifications, relevant experience and skills.
- Data relating to access to and use of our systems, facilities and premises including data generated through monitoring by camera or other means of surveillance.
- Data relating to any travel done for RIT Croatia purposes that is considered business travel.

Legal grounds for collecting and processing your personal data may be based on consent, your employment/service contract or based on some of the following laws/regulations: Law on Higher Education and Scientific Activity, Law on Non-profit Accounting, Labor Law, Law on Archiving, Rulebook on Enrollment and Studying at RIT Croatia, Law on Official National Statistics, and other applicable RIT Croatia Rulebooks and Acts.

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HOW DO WE COLLECT PERSONAL DATA?

We will collect your personal data primarily directly from you through direct communication. However, some data may also be collected from your application through state college enrollment portals (postani-student.hr or similar) or later through online portals and social media (Facebook, Instagram, LinkedIn, etc).

HOW DO WE PROTECT YOUR PERSONAL DATA?

We maintain physical, electronic and procedural safeguards in accordance with data protection requirements to protect your personal data from unauthorized access or intrusion. These safeguards include implementing specific technologies and procedures designed to protect your privacy, such as secure filing cabinets, servers, firewalls and SSL encryption. We will at all times strictly comply with applicable laws and regulations regarding the confidentiality and security of personal data.

WITH WHOM WILL WE SHARE YOUR DATA?

We may share your personal data with:

- Our affiliates within RIT Global Group if and to the extent required for the business purposes and legally permitted. In such cases, these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Data Privacy Notice. RIT Global Group consists of: RIT Rochester NY, USA; Global Delivery Corporation, Rochester, NY, USA
- Third parties who process your personal data on their own behalf but in connection with a service provided to us due to legal/regulatory grounds (such as, higher education regulatory bodies, workplace safety regulators, external auditors other governmental authorities).
- Service providers (so called data processors) within or outside of RIT Croatia, domestically or abroad (e.g. webmasters, HR and finance database providers, student database providers, workplace safety advisors, cloud providers) instructed by to process personal data for the Business purposes on our behalf and in accordance with our instructions only. RIT Croatia will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.
- Service providers (so called data processors) within or outside of RIT Croatia, domestically or abroad (anonymised statistics services, independent reviewers, workflow optimization services) instructed by to process personal data for the Business purposes on our behalf and in accordance with our instructions only. RIT Croatia will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.
- Public or governmental bodies such as regulatory (pension funds, health insurance providers, tax authorities) or enforcement authorities, attorneys or courts where we are required to do

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so by applicable law or regulation or at their request if legally permitted and necessary to comply with a legal obligation or for the establishment, exercise or defense of legal claims.

- Otherwise, we will only disclose your personal data when you direct or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or when we suspect fraudulent or criminal activities.

WHERE DO WE PROCESS YOUR PERSONAL DATA?

RIT Croatia is part of the RIT's Global Delivery Corporation. In the course of our business activities, we may transfer your personal data also to recipients in countries outside of the European Economic Area ("third countries"), in which applicable laws do not offer the same level of data protection as the laws of your home country. When doing so we will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of your personal data, in particular by entering into the EU Standard Contractual Clauses. You may contact us anytime using the contact details below if you would like further information on the above.

YOUR DATA PROTECTION RIGHTS

Subject to certain legal conditions, you may request access to, rectification, erasure or restriction of processing of your personal data. You may also object to processing or request data portability. In particular you have the right to request a copy of the personal data that we hold about you. Please refer to Articles 15-22 of the EU General Data Protection Regulation for details on your data protection rights.

For any of the above requests, please send a description of your personal data stating your name, your date of birth and your place of birth as proof of identity to the contact details below. We may require additional proof of identity to protect your personal data against unauthorized access. We will carefully consider your request and may discuss with you how it can best be fulfilled.

If you have given us your consent for the processing of your personal data you can withdraw the consent at any time with future effect, i.e. the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. In case consent is withdrawn, we may only further process the personal data where there is another legal ground for the processing.

If you have any concerns about how your personal data is handled by us or wish to raise a complaint, you can contact us at the contact details below to have the matter investigated. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can make a further inquiry with the designated data protection supervisory authority in Croatia.

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ARE YOU REQUIRED TO PROVIDE PERSONAL DATA?

As a general principle, you will provide us with your personal data entirely voluntary. However, in certain circumstances we are required to collect certain personal data for legal purposes, for example because this personal data is required to be able to issue you a diploma, or provide evidence of legally required trainings or qualifications. In these cases, if you do not provide us with your personal information, we may be unable to properly administer your enrollment, assign certain tasks to you or permit you to participate in certain activities or services offered in connection with your studies at RIT Croatia. If you are an employee or an independent contractor, providing certain set of personal information is a requirement for carrying out your official employment/service contract.

HOW LONG DO WE STORE PERSONAL DATA?

Your personal data will be deleted when it is no longer reasonably required for the business purposes or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. Please contact us via dpo@croatia.rit.edu for further details.

HOW DO WE USE COOKIES ON OUR WEBSITES?

RIT Croatia uses cookies to give you a better online experience and to make the interaction as informative and relevant as possible. In order to make full use of our website on your computer, tablet, and/or smartphone you will need to accept cookies. For more details please refer to our Cookie Statement available at our website.

UPDATES OF THIS DATA PRIVACY INFORMATION

This Data Privacy Notice was last updated in July 2024. We reserve the right to update and change this Data Protection Notice from time to time in order to reflect and changes to the way in which we use your personal data or changing legal requirements. Any amended information to Data Privacy Notice will apply from the date it is posted on RIT Croatia website or otherwise made available to you.

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HOW TO GET IN TOUCH WITH US

If you have any questions regarding your rights or if you have any specific requests relating to your personal data please contact us at:

Data Protection Officer:

Data Protection Officer

Name	Ivona Labaš
Job Title	Director of Strategic Development, ITS & Facilities
Address	Don Frana Bulića 6
City	20 000 Dubrovnik
Country	Croatia
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