

## PRIVACY POLICY IN SCHOLARSHIP RECRUITMENT

### Information on the processing of the personal data of candidates applying for the Reach Higher scholarship and of their parents (legal guardians)

#### I. Information on the administrator of your personal data:

The administrator of your personal data is Akademeia High School spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw at ul. St. Urszula Ledóchowska 2, 02-972 Warsaw, entered in the Register of Entrepreneurs run by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Department of the National Court Register, under numbers: KRS 0000638796, REGON 365509117, NIP 7010618739, being the governing body of the Akademeia High School (further on referred to as the "School").

At any given time, you can contact us in person or by correspondence at the address above, by email at [office@akademeia.edu.pl](mailto:office@akademeia.edu.pl) or by calling +48 22 299 87 87.

#### II. For what purpose and why we avail of the personal data provided by you:

The personal data of candidate for a scholarship holder, as provided by you, and in the case of underage candidates, also personal data of the candidate's parents (legal guardians), are availed by us for the purposes of:

1. completing the scholarship recruitment process, and for facilitating contact with you.

*- legal basis: art. 6 sect. 1 lit. b and e, GDPR in the case of data, the submission of which is necessary for the candidate's participation in the scholarship recruitment process and art. 6 sect. 1 lit. a, GDPR, the so-called "Consent" in the case of data, the submission of which is not necessary for the candidate's participation in the recruitment process;;*

2. fulfilling our legal obligations. In particular, for ensuring compliance of the scholarship recruitment process with the provisions of the Rules and Regulations of the Reach Higher Akademeia High School Scholarships Programme, approved by the decision of the Minister of National Education and for ensuring the safety of candidates for scholarship holders.

*- legal basis: art. 6 sect. 1 lit. c, GDPR;*

3. in connection with our legitimate interests and the legitimate interests of our partners, and in particular, in order to:

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<sup>1</sup> Whether or not providing specific personal data is necessary for candidate's participation in the scholarship recruitment process has been indicated in case of all fields of the scholarship recruitment form. Data that must be provided for participation in the scholarship recruitment process is marked with an asterisk (\*).



- a. ensure that the scholarship recruitment process may be carried out in a manner convenient for you, keeping you informed of the progress with respect to your applications;
- b. prevent fraud, for instance, through your identification;
- c. engage in direct marketing;
- d. realise internal administrative objectives, pursued by corporate group;
- e. provide network and information security, for instance, to ensure that the information system is robust enough to withhold any incidental adverse occurrences and unlawful or unfriendly activities that violate the availability, authenticity, integrity and confidentiality of personal data either held or transmitted;
- f. ensure security of services offered or provided by information networks and systems, for instance, in preventing unauthorised access to electronic communication networks;
- g. analyse data, among others, to cater for the needs of streamlining the scholarship recruitment process.

- legal basis: art. 6 sect. 1 lit. f GDPR;

4. for other purposes, if you have agreed to them

- legal basis: art. 6 sect. 1 lit. a, GDPR.

### III. What personal data we process and how:

1. In order to apply for the scholarship, you voluntarily fill out the scholarship recruitment form. You provide us with personal data, i.e. personal data of the candidate, and in the case of underage candidates, in addition to this, the personal data of at least one of the candidate's parents (legal guardians).
2. In the case of candidate should be provided: name and surname, date and place of birth, PESEL number (if candidate has one) and at least one piece of information:
  - a. stating that during the last two years of study period, the candidate has become award winner or finalist of a recognised contest of academic knowledge or academic olympiad;
  - b. stating that the candidate has obtained an average grade in compulsory subjects, which has been calculated on the basis of a school or class certificate in last completed school year, of at least 4.5 or another comparable result, if the candidate has been evaluated according to a different grading system;
  - c. on results obtained by the candidate from each part of the junior high school examination, if they are above 80% of each part or average of the exam results from The General Certificate of Secondary Education exams or comparable results from other equivalent examinations;
  - d. on documented outstanding results obtained by the candidate in a given field of education or a sport discipline;
  - e. on the above-average academic or sporting achievements of the candidate, documented by a recommendation issued by an academic entity, such as a

research institute, college, educational organisation or an individual or institution of recognised academic authority.

3. If the candidate is of legal age, additionally shall be provided: telephone number and e-mail address.
4. If the candidate is underage – shall be provided the personal details of the candidate's parent (legal guardian): name and surname, as well as phone number and e-mail address.
5. Providing the above-mentioned personal data is on voluntary basis, however, failure to do so will result in the candidate being unable to proceed to the next stage of the scholarship recruitment procedure and, as a consequence, a failure to obtain scholarship.
6. In order to take care of your comfort and to perform the scholarship recruitment process in the most earnest possible way, we also provide you with the option of submitting other supporting information, including personal data such as: telephone number and e-mail address of underage candidate - to facilitate contact between us; information about schools or institutions that the candidate has attended in the past, information about the candidate's foreign languages skills, the candidate's interests and predispositions, information about the candidate's aspirations (plans for the future), completed courses, internships, apprenticeships and of any voluntary work taken up in the past - in order to learn more about candidate and to qualify the student as a candidate for appropriate class, to ensure appropriate selection of subjects examined at the final stage of recruitment, to create candidate's academic profile, and also to predetermine candidate's level of English language skills. We also encourage the candidate and parents (guardians) of the candidate to express their own views on the candidate freely – so as to enable you to provide us with any other essential information that may be relevant for the scholarship recruitment process. Providing this information to us, including personal data, is on voluntary basis.
7. With the object of levelling the opportunities in the recruitment process for candidates with dyslexia, dysgraphia or those individuals struggling with other learning difficulties, we let you provide us with relevant information in this matter. Obviously, you do not need to provide us with this data. However, if you fail to do this, the scholarship candidate may not receive any extra support during the second stage of the scholarship recruitment process (the Scholarship Committee interviews), in the form of e.g. more time allowed for answering a question.
8. We also let you provide information on the level of income obtained per person in the family of candidate. Providing this information is on voluntary basis, however, if a candidate is qualified for a scholarship, a failure to do so will result in assignment of the grant of the lowest amount resulting from the provisions of the Rules and Regulations of the Reach Higher Akademeia High School Scholarship Programme.
9. When you submit an application for participation in the recruitment process in electronic form, which is provided on our website, we collect information on a given date and time of your sent query, including documents and the IP of device used to dispatch the application.

#### IV. Who we can share your personal data with:

We may share your personal data with:

1. Entities processing personal data on our behalf, and in particular:
  - a. our subcontractors, including teachers and non-pedagogical staff;
  - b. entities providing services or providing us with ICT system;
  - c. entities providing us with consultancy services, including legal services.
2. Other personal data administrators acting on their own behalf, in particular our partners, i.e. entities being part of corporate group.

V. We do not transfer your personal data to countries and organisations outside of the European Economic Area.

VI. How long and on the basis of what criteria will we process your personal data:

If we process your personal data on the basis of your consent granted for marketing purposes, we will do so until you withdraw your consent.

If we process your personal data on the basis of your consent granted for purposes other than marketing, and in particular, for the purposes of scholarship recruitment, we will do so no longer than past the time when you withdraw your consent, but not any longer than by 31 August following the day of the termination of scholarship recruitment in the case of candidates qualified to receive the scholarship or no longer than for a period of three months from the date of the termination of the scholarship recruitment process in the case of candidates not qualified to receive the scholarship. In that same time period, we will process your personal data pursuant to art. 6 sect. 1 lit. b, c and e, GDPR.

Subsequently, after limiting the scope of processed personal data to the data required for fulfilling our legal obligations, the data will be processed within the time period, as specified in the generally applicable provisions of the law or in accordance with the criteria set out therein.

During that same time period, your personal data will be processed with the object of pursuing our legitimate interests and the legitimate interests of our partners, provided you do not object to this. This shall also apply, when there are observed any significant, legitimate grounds for processing the data that override your interests, rights and freedoms, or in the presence of the grounds for either establishing, pursuing or defending claims.

VII. What rights do you have and how to implement them:

1. We will provide you with the confirmation on the fact of processing your personal data, and we will provide you with access to it at your request, and we will also rectify any incorrect data or supplement incomplete data.
2. In situations outlined in the personal data protection law, and to the extent indicated therein, we will also exercise your rights to:
  - a. delete your personal data;
  - b. restrict the processing of your personal data;
  - c. transfer your personal data;
  - d. object to the processing of your personal data.

3. If the processing of personal data is conditional on your expressed consent, you may withdraw your consent at any time.
4. If you are interested in exercising any of the above rights, you are kindly asked to contact us in order to address applicable issue.

VIII. Right to file a complaint to supervisory authority:

We make every effort to ensure that the processing of your personal data is carried out in accordance with the law. However, if you believe that we have committed a violation in this respect, you have the right to file a complaint to supervisory authority to handle such issue, i.e. the President of the Office for Personal Data Protection.

IX. Additional information:

By 'GDPR' we understand the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data in force in Poland from May 25, 2018, and repealing Directive 95/46 / EC (the so-called General Data Protection Regulation).