

## PRIVACY POLICY OF MTÜ TARTU ÜLIÕPILASKÜLA

MTÜ Tartu Üliõpilasküla (registry code 80012342, located at Narva mnt 25, 51009 Tartu) (hereinafter: the Student Village) as the data controller is committed to protecting the privacy of its employees and customers. It has therefore prepared this Privacy Policy describing the processing of personal data.

### 1. DEFINITIONS

**Data subject** means a natural person whose personal data is processed.

**Tenant** (also data subject) means every natural person who uses or has expressed their wish to use the accommodation and related services provided by the Student Village on the basis of a tenancy contract.

**Customer** (also data subject) means every natural person who uses or has expressed their wish to use the services provided by the hostel.

**Applicant** (also data subject) means any natural person who applies for a job in the Student Village, i.e. participates in the recruitment process.

**Employee** (also data subject) means any natural person who has an employment relationship or relationship under the law of obligations with the Student Village based on an employment contract, contract for services, authorisation agreement, etc.

**Personal data** means any information relating to an identified or identifiable natural person.

**Processing** means any operation which is performed on personal data: collection, recording, organisation, consultation, storage, use, adaptation and alteration, retention, transmission, erasure or destruction.

### 2. GENERAL PROVISIONS

- 2.1. The Student Village processes personal data only in accordance with the requirements of legislation and subject to every (organisational, IT, etc.) precaution to protect the personal data.
- 2.2. The privacy policy applies to all data subjects specified in this document or its annexes, subject to the exceptions set out below.
- 2.3. The Student Village has the right to amend its privacy policy. The current version of the privacy policy can be found on the website. All annexes to this document are not publicly available.

### 3. PROCESSING IN THE USE OF CCTV CAMERAS

- 3.1. The purpose of using CCTV cameras on the territory of the Student Village is to protect persons and property, and its legal basis is Article 6(1)(f), i.e. the legitimate interest of the Student Village.
- 3.2. The tenants have the right to invite guests to the rented premises under the tenancy contract entered into with the Student Village. Thus, third parties have access to the residence halls managed by the Student Village. Consequently, the common areas in residence halls must be considered public places.
- 3.3. CCTV cameras have been installed according to the principle of minimality, and the collected data is used and processed solely for the purpose for which it is collected.
- 3.4. The location of CCTV cameras is selected according to the impact assessment prepared about the use of CCTV cameras, taking into account, in particular, the purpose for which they are used.
- 3.5. The images recorded by the CCTV cameras are used if other measures are not sufficient to ensure the security of persons and property.
- 3.6. When persons enter the field of view of CCTV cameras, they are informed about this by the notices (pictures, signs, etc.) displayed in a visible place.
- 3.7. Cameras that record entrances to the residence halls from the outside can be observed live. The purpose of this is to respond quickly to situations where the tenants, customers, partners of the Student Village or emergency services must be allowed access to the building.
- 3.8. The CCTV cameras used by the Student Village (including video recordings, camera views, deadlines for retention of recordings) are mapped for each residence hall in the document *Valvekaamerad üliõpilaselamutes.xls*. The internal rule of procedure of the Student Village *Valvekaamerate kasutamise kord* defines the rules for accessing the recorded material, the procedure for using the material, etc.
- 3.9. The Student Village transmits video recordings to third parties (e.g. law enforcement authorities) only on the basis of an official written request and/or an obligation arising from law.
- 3.10. Recordings are retained for no more than 7 days.

### 4. VISITING STUDENT VILLAGE WEBSITES

The Student Village uses cookies on its websites to ensure the correct technical functioning of the website and a better user experience. The Student Village does not collect the personal data of visitors for statistical, marketing or other purposes.

### 5. RIGHTS OF DATA SUBJECT

- 5.1. A data subject has the right to:

- 5.1.1. access the data collected about them. The Student Village may request additional information for identification of a person if the person requests access to personal data;
- 5.1.2. Request rectification of any incorrect data collected about them if the data has changed or is otherwise inadequate. The data subject may further request the completion of incomplete personal data;
- 5.1.3. Request erasure of the data collected about them. Only personal data that is not necessary for the performance of the contract at the given moment or that is not subject to a statutory mandatory retention period can be erased.
- 5.1.4. Withdraw their consent at any time if processing is based on consent. This does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

## 6. CONTACT DETAILS

- 6.1. Explanations about personal data processing can be requested from the controller by sending an email message to [info@campus.ee](mailto:info@campus.ee).
- 6.2. Data Protection Inspectorate (email: [info@aki.ee](mailto:info@aki.ee), telephone: 627 4135).

## 7. ANNEXES

- Annex 1 – Processing of Personal Data of Tenants
- Annex 2 – Processing of Personal Data of Customers
- Annex 3 – Processing of Personal Data of Applicants
- Annex 4 – Processing of Personal Data of Employees