

APPROVED
by Order No. 320 of the Rector of
Vilnius Gediminas Technical University
of 2 April 2019

EMPLOYEES' PERSONAL DATA STORAGE POLICY OF VILNIUS GEDIMINAS TECHNICAL UNIVERSITY

CHAPTER I GENERAL PROVISIONS

1. The Employees' Personal Data Storage Policy of Vilnius Gediminas Technical University (hereinafter referred to as the Employees' Data Storage Policy) establishes the principles of activities of Vilnius Gediminas Technical University (hereinafter referred to as VGTU) and obligations followed and complied with by VGTU in processing of personal data of employees and prospective employees presented to it or collected otherwise.

2. Terms used in the Employees' Data Storage Policy:

2.1. **Automated data processing** shall mean data processing operations performed wholly or partly by automated means.

2.2. **Non-automated data processing** shall mean data processing operations performed by non-automated means (processing information in documents).

2.3. Other terms used in the Employees' Data Storage Policy shall be understood and interpreted as defined in the Law of the Republic of Lithuania on the Legal Protection of Personal Data, the Personal Data Protection Policy of VGTU.

4. In controlling personal data of employees and prospective employees, VGTU shall follow the following principles of personal data processing:

4.1. Personal data of employees and prospective employees shall be processed in accordance with the principles of lawfulness, fairness and transparency, shall be collected for specified, explicit and lawful purposes and shall not be further processed in a way incompatible with those purposes.

4.2. In collecting personal data of employees and prospective employees, one must get ascertained that such data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (the data minimization principle).

4.3. Personal data of employees and prospective employees must be accurate and kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay (the accuracy principle).

4.4. Personal data of employees and prospective employees shall be kept in such a form which permits identification of data subjects for no longer than necessary for the purposes for which it is processed (the storage limitation principle).

4.5. Personal data of employees and prospective employees must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (the integrity and confidentiality principle).

4.6. VGTU shall be responsible for complying with the above principles and must be able to demonstrate that they are being complied with (the accountability principle).

5. E-mail addresses provided to VGTU employees, telephone numbers assigned to the workplace, other means of communication, information related to work functions and their performance shall be public.

6. Taking into account the peculiarities of activities of VGTU as a higher education and research institution, the activities carried out by it are publicized. Public events are organized at the premises and in the territory of VGTU, where employees can be filmed and/or photographed. The fact of video recording, live video streaming, taking of photos shall be indicated in the event information notice, informing additionally about it before the event starts.

CHAPTER II PURPOSES OF DATA COLLECTION AND PROCESSING

7. VGTU shall collect and process data of a prospective employee by non-automated means in order to assess his/her suitability for the job. For this purpose, the person shall provide general data (first name and surname, date of birth, contact details (telephone number, e-mail address)) and data required to assess his/her suitability for the job he/she applies for (education and qualification, work experience, etc.).

8. The personal data of an employee shall be collected and processed by non-automated and automated means for the following purposes:

8.1. the conclusion, performance of the employment contract and accounting. For this purpose, the following data of an employee shall be collected and processed: first name and surname, residence address, date of birth, citizenship, bank account number, social security number, education and qualification, curriculum vitae, in cases provided for in legal acts the personal identification number shall be processed under the compulsory procedure;

8.2. performance of the employer's obligations to the employee and third parties (including state institutions and bodies) established in relevant legal acts. For this purpose, the following data of an employee shall be collected and processed (depending on his/her job position): health data, marital status;

8.3. ensuring adequate communication with the employee, including after working hours and in case of accidents. For this purpose, the following data of an employee shall be collected and processed: address of the employee's place of residence, his/her telephone number, e-mail address and the name, phone number of the contact person indicated by the employee to be contacted in case of an accident;

8.4. performance of work functions. For this purpose, data of computer hardware and office telephones used for performance of work functions (such as Internet Protocol (IP) addresses, unique identification (ID) login names, data on outgoing and incoming calls, their duration, etc.) shall be collected and processed;

8.5. ensuring the safety of the staff, students, other persons in the premises and security of the premises. For this purpose, video surveillance and recording shall be performed in some premises of VGTU;

8.6. internal communication for linking the employee's image with his/her identification data. For this purpose, with the consent of the employee, his/her photo shall be collected and processed in the VGTU information system using special technical means enabling to identify the employee.

9. Personal data of employees shall be collected directly from employees or obtained from other data controllers upon employee's request. In order to determine specific personal data, relevant documents shall be provided (such as personal identity documents, qualification documents, health data) and their copies shall be made.

10. Employees' personal data, such as Internet Protocol (IP), unique identification (ID) login names, required for performance of work functions, shall be collected when an employee uses computer hardware to access the VGTU intranet, also data of office telephones used by employees, including phone numbers of outgoing and incoming calls, duration of calls, shall be collected from operators providing communication services.

11. Except for cases provided for in legal acts, where recruiting is forbidden in the absence of relevant data (for example, without health checks), the employee may refuse to provide his/her personal data necessary for performance of the employer's obligations to the employee (for example, data about his/her marital status). In such a case, however, the employee may prevent himself/herself from exercising his/her relevant statutory rights (for example, without providing data on his/her marital status, an employee will not be able to exercise the right to additional vacation time provided for in the Labour Code).

12. More detailed and more specific information on the processing of personal data shall be provided when collecting data from the employee in the Human Resources Directorate, the Centre

for Information Technologies and Systems, the Finance Directorate, the Occupational Safety and Health Division.

CHAPTER III DATA PROCESSING PERIODS

13. When processing personal data of employees and prospective employees, we follow the principle that data is to be processed for no longer than necessary for the purposes for which it is processed. Data processing periods vary depending on the bases and purposes of processing data of different categories.

14. Specific time limits for the processing of specific personal data shall be indicated to data subjects at the time of collection of that data from them:

14.1. Personal data of a prospective employee shall be processed during the process of selection for the job.

14.2. Employees' personal data for employment related purposes after termination of the employment contract shall be stored in accordance with the retention periods specified in the VGTU Documentation Plan. The documentation plan is approved annually by the Rector's order.

15. Upon the expiry of the data processing periods, the data shall be erased or destroyed beyond recovery or modified so that it cannot be linked to a particular natural person.

16. VGTU employees whose work functions involve the processing of personal data, shall destroy documents containing personal data, or copies thereof, collected by non-automated means, in such a way that the information contained therein is not recognizable and shall destroy the data collected by automated means by deleting unnecessary personal data files from storage media beyond recovery.

CHAPTER IV DATA DISCLOSURE AND TRANSFER

17. Personal data of employees may be provided to third parties and registers administered by them under the procedure set by legal acts applicable in the Republic of Lithuania (for example, to registers supervised by the Ministry of Education, Science and Sport of the Republic of Lithuania, etc.), to information systems collectively used by higher education and research institutions (for example, information system eLABa of the Lithuanian academic electronic library, etc.) in accordance with the legal acts regulating the operation of these systems.

18. Personal data of employees may be provided without a separate consent of the employees under the procedure set by legal acts applicable in the Republic of Lithuania:

18.1. in the case of a legal obligation to provide such information to the relevant state institutions and bodies (such as the State Social Insurance Fund Board, law enforcement authorities at their lawful request, etc.);

18.2. when performing contractual obligations if the fulfilment of contractual obligations is related to the activities of VGTU as a higher education and research institution and the provided data is related to the functions performed by the employee.

19. Personal data of employees may be transferred at the request of the employee only if technically possible.

20. The employee must indicate in the request the personal data in respect of which he/she wishes to exercise his/her right to data portability and whether he/she wishes that his/her personal data be sent to him/her or to another controller indicated by the employee.

21. An employee does not have the right to data portability with regard to personal data processed in non-automated filing systems such as paper files.

CHAPTER V ENSURING SECURITY OF DATA

22. In order to protect the processed data from loss, unauthorized use or unlawful modification, VGTU shall implement and ensure the appropriate organizational and technical measures:

22.1. The security and monitoring of the premises where the personal data of the employees is kept, compliance with the fire safety rules, restriction of and control over the rights of users of the information system and the databases shall be ensured. Staff working with personal data of employees and prospective employees are bound by confidentiality duties set in legal acts.

22.2. The software shall be constantly updated, provided with firewalls and antivirus software, back-up data copies shall be made, data encryption shall be performed, etc.

CHAPTER VI DATA SUBJECTS' RIGHTS

23. VGTU undertakes to respect the rights of employees and prospective employees as data subjects, which are specified in the Personal Data Protection Policy of Vilnius Gediminas Technical University.

24. Any request in connection with the processing of personal data may be submitted by a data subject by e-mail vgtu@vgtu.lt or by post at Saulėtekio al. 11, LT-10223, Vilnius, or can be made directly upon personal arrival.

25. VGTU shall examine all requests related to the processing of personal data and reply to data subjects in accordance with the established procedure.

CHAPTER VII FINAL PROVISIONS

26. Legal relations related to the Employees' Data Storage Policy shall be governed by the legal acts applicable in the Republic of Lithuania.