Kreditožrouti

Regulatory Compliance & Terms of Usage

Verification of Compliance with VŠE Internal Regulations

Document Version:	v0.0.1 — Beta Launch
Date:	January 31, 2026
Applicable To:	Kreditožrouti Web Application
Regulations Reviewed:	SR 05/2018, PR 04/2019, PR 02/2023, Study Rules
Audience:	Students, Professors, University Staff

1. Executive Summary

You might be wondering: is Kreditožrouti allowed? Does it break any university rules? Is my data safe? This document answers those questions by mapping every applicable VŠE regulation to the application's actual implementation. The short answer: yes, it's fully compliant. Here's the detailed breakdown.

> **Compliance Summary**
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> ☑ SR 05/2018 (Data Protection): COMPLIANT — No personal data processed
>
> ☑ PR 02/2023 (IS Usage Rules): COMPLIANT — Read-only public data access, scraping approved by InSIS Řídicí výbor
>
> ☑ PR 04/2019 (Webhosting Rules): NOT APPLICABLE — Self-hosted infrastructure
>
> ☑ Study & Examination Rules: COMPLIANT — Supports student course discovery

2. Application Overview

Kreditožrouti is a web application that helps VŠE students discover courses, plan schedules, and detect timetable conflicts. It scrapes the publicly accessible InSIS course catalog (no authentication required), normalizes the data, and presents it through a modern search interface with advanced filtering capabilities.

2.1 Data Sources & Scope

Data Category	Source	Personal Data?
Course metadata (title, ident, credits, syllabus)	InSIS public catalog	No
Timetable slots (day, time, room)	InSIS public catalog	No
Lecturer names (as course attribute)	InSIS public catalog	Limited — see §2.2
Study plans (structure, categories)	InSIS public catalog	No
Faculty information	InSIS public catalog	No
Student personal data	NOT COLLECTED	**N/A — Never accessed**
Student grades / enrollment	NOT COLLECTED	**N/A — Never accessed**
Authentication credentials	NOT COLLECTED	**N/A — No login system**

2.2 Lecturer Names — Classification

Lecturer names appear as attributes of course records in the publicly accessible InSIS catalog. Per SR 05/2018 Article 19(2), VŠE permits publication of employee names, titles, position, and teaching activities (subparagraphs a–c, e, n). Kreditožrouti displays lecturer names strictly in the context of course teaching assignments, which falls within this permitted scope. No additional personal information (contact details, photos, research output) is scraped or displayed.

3. SR 05/2018 — Data Protection

Směrnice rektora 05/2018 (Ochrana a zpracovaní osobních údajů) implements GDPR requirements within VŠE. This section maps each applicable article to Kreditožrouti's implementation.

Article	Requirement	Status	Implementation
Art. 1(2)	Scope: processing by employees/students in course of duties	☑	Kreditožrouti processes only publicly available course catalog data. No student or employee personal data is collected, stored, or processed beyond what is already public in InSIS.
Art. 13	Register processing activities with Representative (DPO)	☑ N/A	No personal data processing activity exists that requires registration. The application processes publicly available institutional data (course metadata), not personal data per GDPR Art. 4(1).
Art. 14(1)	Lawful basis for processing required	☑	Primary data (courses, timetables, plans) is institutional, not personal. Lecturer names are published per Art. 19(2)(n). No additional lawful basis is required.
Art. 16	Special categories (biometric, health) require explicit consent	☑ N/A	No special category data is collected or processed. The application has no user accounts, no biometric data, no health data.
Art. 17	Inform data subjects transparently	☑	Lecturers are displayed only within the context of their publicly listed teaching assignments. A disclaimer is shown on the application.
Art. 19(2)	Publishable data limited to: name, titles, position, teaching	☑	Only lecturer name as a course attribute is displayed, which is explicitly within the permitted scope (subparagraph n: teaching carried out at VŠE).
Art. 20	Third-party data sharing requires DPO notification	☑ N/A	Kreditožrouti does not share any data with third parties. No analytics, tracking, or external API integrations transmit data externally.
Art. 21	Security measures: encryption, access controls, incident reporting	☑	HTTPS via Traefik/Let's Encrypt. Environment-based secrets. Parameterized queries. Bearer token authentication for admin endpoints. Sentry error tracking.

4. PR 02/2023 — IS Usage Rules

Pravidla provozovaní a využívání informačních systémů (PR 02/2023) governs the creation, operation, and usage of information systems at VŠE.

4.1 Classification: Is Kreditožrouti a VŠE IS?

> **Key Determination**
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> Kreditožrouti is NOT a VŠE Information System as defined in PR 02/2023 Art. 3. It is an independent, externally hosted, student-initiated tool that consumes publicly available data. It is not operated by any VŠE organizational unit, is not registered in the VŠE IS registry, and does not process data within VŠE's infrastructure.
>
> However, certain provisions remain relevant because the application interacts with InSIS data. These are analyzed below.

4.2 Relevant Provisions

Article	Requirement	Status	Kreditožrouti Position
Art. 3(5)	VŠE maintains a registry of its IS, managed by Cyber Security Manager	☑ N/A	Kreditožrouti is not a VŠE IS and therefore is not subject to registry. It is a student project hosted on external infrastructure.

Art. 8(2)	Users must handle IS data in accordance with its purpose and VŠE policies	☑	All data sourced from InSIS is used strictly for course discovery and schedule planning — the same purpose for which it is publicly available in InSIS.
Art. 9A.8(1)	Users must not arbitrarily modify, insert, or delete data in InSIS	☑	Kreditožrouti performs READ-ONLY operations on publicly accessible InSIS pages. No data is written back. No modifications are made.
Art. 9A.8(2)	Automated execution of InSIS functionality requires approval	☑ Approved	The InSIS Řídicí výbor (Steering Committee) has reviewed and approved this use case. The scraper operates read-only with rate limiting, job deduplication, and scheduled off-peak runs (1–2 AM).

InSIS Steering Committee: Approved

The InSIS Řídicí výbor (Steering Committee) — the administrators responsible for the InSIS information system — has reviewed Kreditožrouti's scraping scope, frequency, rate limiting measures, and data usage, and has granted approval for this project use case.

This approval covers read-only scraping of the publicly accessible InSIS course catalog for the purpose of course discovery and schedule planning by VŠE students.

5. PR 04/2019 — Webhosting Rules

Pravidla používaní serveru webhosting.vse.cz (PR 04/2019) governs websites hosted on VŠE's webhosting.vse.cz server.

> **Applicability Assessment**
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> NOT APPLICABLE. Kreditožrouti is NOT hosted on webhosting.vse.cz. It is deployed on independent infrastructure using Docker containers with Traefik reverse proxy and its own domain.
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> However, if the project were to migrate to VŠE infrastructure in the future, the following provisions would apply:

5.1 Future-Proofing: Webhosting Compliance Readiness

Article	Requirement	Ready?	Current State
Art. 3	Domain names must not violate good morals or impersonate other units	☑	"Kreditožrouti" is a playful student-facing name. It does not impersonate any VŠE unit and is not commercial.
Art. 4	Domains require electronic approval from rector/dean	☑ Ready	If migrating to VŠE.cz subdomain, formal approval process is understood and will be followed.
Art. 8	Official pages must use unified VŠE visual identity	☑ Ready	Kreditožrouti already mirrors InSIS visual language. Adaptation to official branding would be straightforward.
Art. 11	Non-official pages must display disclaimer	☑	Application displays a visible disclaimer stating it is not an official VŠE application.
Art. 16	HTTPS is mandatory	☑	HTTPS enforced via Traefik with automatic Let's Encrypt certificates. HTTP redirected to HTTPS.

6. Study & Examination Rules Context

The Studijní a zkušební řád VŠE establishes the framework within which course registration, study plans, and academic scheduling operate. Kreditožrouti supports (but does not replace) the official processes defined in these rules.

Article	Study Rule	Kreditožrouti Support
Art. 9	Course registration is done via InSIS in defined periods	Kreditožrouti is a PLANNING tool. Students build draft schedules here, then register officially in InSIS. This distinction is clearly communicated.
Art. 14	Study plans prescribe required courses per semester	The Study Plan Wizard categorizes courses as compulsory, optional, or elective per the selected plan, helping students understand their obligations.
Art. 13	Credit system: students must maintain credit thresholds	Course credit values are displayed prominently. Completeness checking verifies course unit selection.
Art. 10	Grading/classification recorded in InSIS	Kreditožrouti does NOT access, display, or process any grade or classification data. It is strictly a course discovery tool.
Art. 8	Course accreditation changes must be published before registration	Kreditožrouti scrapes during registration preparation periods to ensure data reflects current semester offerings.

7. Terms of Usage

The following terms govern the use of the Kreditožrouti application by its end users.

7.1 Nature of Service

1. Kreditožrouti is a supplementary course planning tool. It is NOT affiliated with, endorsed by, or operated by Vysoka skola ekonomicka v Praze (VŠE).
2. The application does NOT replace the official InSIS course registration system. All official course registrations must be completed through InSIS.
3. Course data is sourced from publicly accessible InSIS catalog pages and may not reflect real-time changes. Users should verify information in InSIS before registration.

7.2 Data & Privacy

4. Kreditožrouti does NOT collect, store, or process any personal data of its users.
5. No user accounts exist. No login is required. No cookies are set for tracking purposes.
6. Schedule data created by users is stored exclusively in the user's browser (LocalStorage) and is never transmitted to any server.
7. Lecturer names are displayed solely as attributes of course records, consistent with their public availability in the InSIS catalog and within the scope of SR 05/2018 Article 19(2).

7.3 Limitations & Disclaimers

8. Course information is provided "as is" without warranty. Data accuracy depends on the InSIS source and scraping freshness.
9. The application is provided free of charge and carries no commercial purpose.
10. The developers are not responsible for scheduling decisions, missed registrations, or any academic consequences arising from reliance on this tool.
11. The service may be discontinued or modified at any time without prior notice.

7.4 Acceptable Use

12. Users shall not attempt to circumvent any access controls, reverse-engineer the API, or use automated tools to mass-download data from the application.
13. Users shall not use the application for any purpose that violates VŠE internal regulations or applicable Czech law.

8. Technical Security Measures

Measure	Implementation
Transport Encryption	HTTPS enforced via Traefik reverse proxy with automatic Let's Encrypt certificate provisioning. HTTP-to-HTTPS redirect enabled.
SQL Injection Prevention	All database queries use Kysely's parameterized query builder. No raw SQL string concatenation.
Input Validation	All API inputs validated via Zod schemas before processing.
Secret Management	All secrets stored in environment variables. No hardcoded credentials in source code.
API Authentication	Administrative/command endpoints protected by bearer token. Public endpoints serve only non-sensitive course data.
Session Security	Redis-backed sessions via connect-redis with configurable session secrets.

Error Monitoring	Sentry integration for real-time error tracking and alerting.
Scraping Controls	BullMQ job deduplication. Rate limiting between requests. Scheduled off-peak runs (1–2 AM).
Container Isolation	All services run in isolated Docker containers with minimal exposed ports.
CI/CD Pipeline	GitHub Actions with automated builds, linting, and container image publishing.

9. Compliance Status & Remaining Steps

Overview of all compliance-related actions and their current status:

#	Action	Regulation	Priority	Status
1	Obtain scraping approval from InSIS Řídicí výbor per Art. 9A.8(2)	PR 02/2023	—	☑ Approved
2	Add visible non-official disclaimer to landing page per Art. 11	PR 04/2019	—	☑ Implemented
3	Document scraping frequency and rate limits for DPO review	SR 05/2018	—	☑ Prepared
4	Prepare DPIA if scope expands to personal data	SR 05/2018	Low	N/A — not needed
5	Register as student project with faculty/department	General	Medium	⚠ Pending

> **Bottom Line**
>
> Kreditožrouti is fully compliant with all applicable VŠE regulations. It collects no personal data, accesses only publicly available course catalog information, stores your schedule exclusively in your own browser, and has received explicit approval from the InSIS Řídicí výbor (Steering Committee) for its data sourcing approach.
>
> The only outstanding administrative step is formal registration as a student project with the relevant faculty/department, which is in progress and does not affect the application's compliance or your ability to use it safely.
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> **If you have any questions about this document or the application's compliance, feel free to reach out to the project team.**